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ABSTRACT

The report of the Council on Postsecondary Accreditation (COPA) self-study advisory panel is presented in three parts. Following a historical review of the formation of COPA, part 1 looks at the first 5 years (1975-1980), and explains 1982-1986 activities as they related to priorities adopted in 1982. Information is offered on: COPA objectives and work responsibilities; governance and finance (governance narrative, historical development, and current budgets); policy development; committee on recognition; the COPA assemblies; professional development; publications; funded projects; research activities; relations with the Federal government; and relations with the states. A key to acronyms used in background materials is provided. Membership lists are included for the self-study advisory panel, the board of directors, ex-officio, the committee on recognition, and COPA staff. In part 2, COPA self-study advisory panel findings and recommendations are listed that were submitted to the COPA board in October 1986 regarding organizational objectives, priorities, governance, and financing. Particular focus is on the role of accreditation in achieving educational quality. Part 2 includes the changes to the panel and an overview of the study, written and oral testimony, and suggested changes in articles of incorporation and bylaws. A glossary of acronyms is included. Part 3 contains the COPA articles of incorporation, amendments to those articles, and bylaws. (SM)

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The Council on Postsecondary Accreditation

1986 SELF-STUDY
Background, Findings & Recommendations,
and Resulting Bylaw Changes
(Prepared August 1987)

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The Council on Postsecondary Accreditation

1986 SELF-STUDY: Background Materials, Findings and Recommendations, and Resulting Bylaw Changes

Table of Contents

TAB

28. Self-Study Advisory Panel Background Materials (May 1986)

29. Self-Study Advisory Panel Findings and Recommendations (October 2, 1986)

30. Articles of Incorporation and Bylaws of the Council on Postsecondary Accreditation (revised according to Self-Study recommendations) (April 17, 1987)

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The Council on Postsecondary Accreditation
SELF-STUDY ADVISORY PANEL
Background Materials
May 1986

Table of Contents

Item		Page
I.	Introduction	
	A. Historical Background and Formation of COPA	1
	B. The First Five Years: 1975-1980	5
II.	Activities from 1982-1986 as Related to Priorities Adopted in 1982	9
III.	Activities from 1982-1986	
	A. COPA Objectives and Work Responsibilities	17
	B. Governance and Finance	
	1. Governance Narrative	33
	2. Historical Development (Tables I-V)	39
	3. Current Budgets	49
	C. Policy Development (Attachment: List of Committees)	59
	D. Committee on Recognition	67
	E. The COPA Assemblies	71
	F. Professional Development	75
	G. Publications	79
	H. Funded Projects	83
	I. Research Activities (Attachment: Research File)	87
	J. Relations with Federal Government	95
K.	Relations with the States	99
	* * * * *	
	Key to Acronyms	103
	Membership Lists	105
	Self-Study Advisory Panel	
	Board	
	Committee on Recognition	
	Staff	

HISTORICAL BACKGROUND AND FORMATION OF COPA

The Council on Postsecondary Accreditation was formed in 1975 through the union of two previous organizations both of which were established in 1949. The first, the National Commission on Accrediting (NCA), was created not by the accrediting community, but by national institutional higher education organizations concerned about proliferation of professional or specialized accrediting bodies. Its initial agenda called not only for oversight of specialized accrediting bodies, but their elimination, or at least reducing their number to those closely tied to professional licensure and public safety and well-being. All other accrediting activities, it was hoped, would be subsumed under the regional accrediting bodies. NCA was financed not by the accrediting bodies but by the institutions who were members of the supporting national organizations.

The original NCA agenda had to be modified rather quickly in the light of three factors. The first related to the G.I. Bill. By the early 1950's Congress had become concerned with the number of fly-by-night and fraudulent institutions and programs that were cheating former service personnel using their G.I. funds. It turned to accreditation as a means of stemming such abuses. In the Servicemen's Readjustment Act of 1952, Congress called upon the Commissioner of Education to develop a list of accrediting bodies deemed to be reliable authorities as to the quality of education and training offered. Under the Act, the Veterans Administration could accept accredited status of programs or institutions in lieu of carrying out its own approval investigations. The then Commissioner of Education, Earl McGrath, turned to NCA to supply such a list. NCA, still in the process of organization, could not do this. Accordingly, the Commissioner published a list from a recent federal directory of accredited institutions which included most of the existing specialized agencies that the new NCA had hoped to curtail or eliminate. This publication, in effect, gave these agencies federal status.

The second factor was that the regional accrediting bodies indicated very little, if any interest, in subsuming the function of the professional accrediting bodies under their aegis, nor did the specialized accrediting bodies desire to be so subsumed. The third factor was that the effectiveness of NCA depended upon the support and allegiance of college presidents and their willingness not to submit to accreditation except by agencies approved by NCA. The membership of NCA included only a portion of existing colleges and universities and even among these the NCA recommendations were advisory only.

Accordingly, NCA developed into an organization which reviewed and approved or recognized specialized and professional accrediting bodies. Most of the specialized bodies welcomed NCA recognition as a means of assuring acceptance by the academic community. NCA in turn had considerable influence in helping to improve the accrediting process in professional and specialized areas, and in serving as a check against unlimited expansion of specialized accrediting bodies. Nevertheless, the number of specialized accrediting bodies recognized by NCA included some 42 by 1975 when COPA was formed.

The National Commission on Accrediting was essentially regulatory in character, was controlled by organizations other than accrediting bodies and financed directly by institutions. Until 1973, NCA had no representation on its Board of the agencies it recognized, nor did it provide a vehicle or forum for them to get together to consider issues of common concern. In 1973, it added three representatives of the specialized agencies to the Board and created the Council of Specialized Accrediting Agencies (CSAA) to designate the agencies represented. CSAA played an important role in representing the specialized agencies in the discussions leading to formation of COPA. Further, after formation of COPA, CSAA continued to perform the function of electing members to the COPA Board until the creation of the Assembly of Specialized Accrediting Bodies under the reorganization of 1978.

The second organization established in 1949 that was to become an integral part of the Council is what was first called the National Committee of Regional Agencies (NCRA). It changed its name in 1964 to the Federation of Regional Accrediting Commissions of Higher Education (FRACHE). NCRA or FRACHE was a different type of organization altogether than NCA. It was designed to facilitate cooperation among the regions, to share information and particularly, as FRACHE, to develop common policy positions. Its power to adopt policy was considerably restricted, since it took the concurrence of five of the six regional commissions for statement or position to become national policy. FRACHE was a voluntary organization indigenous to the regional accrediting bodies and designed primarily as a forum to consider matters of common concerns. As additional postsecondary commissions were added in New England (The Commission on Vocational, Technical and Career Institutions), Southern (The Commission on Occupational Educational Institutions) and Western (The Accrediting Commission for Community and Junior Colleges) they also became members of the Federation. In the last days of the Federation some of the national institutional accrediting bodies were also invited to join.

The national institutional accrediting bodies constitute a third group that until close to the formation of COPA were not a part either of NCA or FRACHE. These included the accrediting bodies primarily concerned with proprietary education which to a large extent undertook accrediting activities in the 1950s and 1960s, in part to provide a means whereby students of proprietary schools could receive federal funds. Prior to the Marjorie Webster College case in the late 60's and the early 70's, none of the regionals accepted proprietary institutions into candidacy or accreditation. Soon after the Marjorie Webster case, even though the Middle States Association won the case and thus legally had the right to exclude proprietary institutions, the regionals opened their doors to those proprietary institutions that wished to be regionally accredited. For the proprietary accrediting bodies, however, recognition by the Commissioner of Education constituted their primary legitimatization.

During the late 1960s and the early 1970s, the Office of Education became progressively more active in relation to accreditation. What was to become the Division of Eligibility and Agency Evaluation was established with a Director, Dr. John Profitt, and staff, and subsequently an Advisory Committee

to the Commissioner appointed by the administration. It was the responsibility of the Division to review accrediting bodies for recognition on a four-year cycle. Criteria were established for such recognition which at first closely paralleled those of NCA.

In the early 70's, however, these underwent extensive revisions by the Advisory Committee so that in addition to the good practices and due process standards adopted from NCA, it seemed to a good many people within the accrediting community to redefine the role of accrediting agencies to include not only the assessment of academic quality, but also the enforcement of various public policies positions deemed essential by the Office of Education. These included insuring ethical practices, such as nondiscrimination, on the campus; encouraging educational experimentation and innovation; overseeing the rights, responsibilities and interests of students, the general public in the academic, professional and occupational fields involved, as well as the institutions themselves; and finally providing representation of the public in its accrediting and decision-making processes. While most of these have not been recognized as among the functions accrediting agencies should perform and as relevant to the issue of quality, at that point this aggressive attitude on the part of the Office of Education appeared to a large part of the accrediting community, as a threat to the autonomy of accrediting bodies and of the self-regulatory accrediting process.

Such concern was clearly one of the factors which led to the recognition of the need for a common and single nongovernmental accrediting coordinating body. There were other factors. One was the rapid growth of community colleges during the 1960s. The regionals were slow to respond to the community and junior college movement. A second was growing state concern with vocational occupational education and its inability to receive federal funds, due in part at least, to the fact that at that time, the regionals did not include them nor were there special commissions for them, and there was no way that students of such institutions could become eligible to receive student aid funds. FRACHE commissioned a major study to be done by Dr. Claude Puffer of the University of Buffalo. The result was a report that became known as the "Puffer Report" and rigorously argued the wisdom of merger between NCA and FRACHE to form a single national organization.

As a result of the Puffer report, initial discussions about the possibility of merging were undertaken. Progress, however, was slow. Problems of organization, areas of responsibility, funding and even leadership complicated the picture. In 1973, it appeared that talks had broken down. However, the increased activity on the part of the Office of Education, plus a threat on the part of the national higher education organizations to withdraw support and the announcement by the Director of NCA of his intent to retire was sufficient to break the deadlock and the various parties were able to move rapidly to form the new organization.

The Council on Postsecondary Accreditation was incorporated in the District of Columbia in August of 1974, and held its first Board meeting on January 15, 1975. At that meeting the Board adopted the bylaws which had been previously approved by NCA and FRACHE as a condition of the merger, named its first President, Kenneth Young, as of March 1, and completed other organizational details such as election of officers, assignment of staggered Board terms and the appointment of Committees. The Council had been inaugurated. In many respects, at the outset, it was literally at this stage the joining together of the objectives and structure of the two previous organizations. Since NCA and FRACHE had adjacent offices on the 7th floor of One Dupont Circle, joining the organizations physically meant removing one wall. The period of adjustment and development into a unique organization still lay ahead, and constituted in many respects the major challenge of the first five years.

THE FIRST FIVE YEARS
1975-1980

The first five years of COPA were a period of formation, development and exploration to find more effective means (including structures), for carrying out the Council on Postsecondary Accreditation functions. In the first meeting of the new COPA Board, a task force was appointed to continue to study structure, and a committee to develop recognition criteria was named.

In the beginning the accrediting associations' staff directors had no clear official role in the Council, even though their cooperation was essential to its effective operation. The directors of specialized accrediting bodies met regularly in the Council of Specialized Accrediting Agencies, an organization which, while it elected members to the COPA Board, was not an official part of the COPA structure. The directors of the regional accrediting bodies continued to meet informally. In addition, under the leadership of the American Council on Education, the directors of the seven national higher education organizations represented on the Board formed an Interassociation Presidents' Committee on Accreditation which included the association executives plus their representatives on the Board. Each of these groups had a vital interest in the Council and affected its operation, but was not an official part of it.

The Task Force on Structure reported in 1978. As a result of its report, two assemblies were formed, the Assembly of Institutional Accrediting Bodies and the Assembly of Specialized Accrediting Bodies. Their function was to provide a forum to facilitate discussion and establish consensus but not to approve policy, which was and is a Board prerogative. Further, by addition of accrediting body staff representatives the Board was increased in size to 40 members. At that time, also, a Standing Committee on Finance was formed and was charged among other things with developing a more adequate financial plan to relieve the institutional accrediting bodies from carrying an undue portion of the total financing load. As a result of the work of the special Committee on Provisions for Recognition, Provisions were adopted which were modelled rather extensively after the National Commission on Accrediting standards. The process of review of accrediting agencies got underway. In the next five-year period some 53 member accrediting bodies were reviewed. As a result of the experience with the initial criteria a thorough review and revision was undertaken and the results were reported to the Board at its April, 1981 meeting. With some modifications these recommendations were adopted and the 1981 Provisions are those currently in force with some additional minor revisions.

It was during this period of the first five years that the Council engaged in an extended discussion, which at times reached a confrontation stage, with the Office and then the Department of Education, over the federal role in accreditation. As noted in the section on factors leading to formation of COPA, the federal government had become progressively more active with the establishment of the Division of Eligibility and Agency Evaluation. Concern with what appeared to be overly assertive governmental activity in this direction, including development of criteria for recognition which seemed to

some to go beyond issues of quality to general social issues, was one of the factors which had led to the formation of the Council.

During the period from 1975 to 1980, further revisions were proposed in the federal criteria and even in the legislation which would have appeared to make accrediting bodies responsible not only for attesting to the quality of education and training offered, but also to the probity of the institutions themselves. In the general review of the situation leading up to the higher education amendments of 1980, then Commissioner of Education Ernest Boyer, established an ad hoc discussion group between the Office of Education and the Council.

Interestingly enough, at this point, the Carter administration through the Department of Health, Education and Welfare, proposed that accreditation be removed from the criteria for eligibility for federal funds altogether. Something similar had been recommended or at least suggested in 1971, but had not become an official recommendation of the Department. Not only the Council on Postsecondary Accreditation, but the national higher education organizations and the accrediting communities strongly opposed any deletion of accreditation in determining such eligibility, since the alternatives either involved direct federal review of institutions or reliance upon state authorizing mechanisms. The latter were highly uneven and a number of states did not have any such mechanisms available. A policy statement on "Accreditation and Eligibility" was adopted by the Council in Atlanta, Georgia on April 8 and endorsed in turn by the Interassociation Presidents Committee on Accreditation.

The end result was that Congress left the current eligibility system largely unchanged, except in two respects. The first was that the Advisory Committee to the Commissioner on Accreditation and Institutional Eligibility was legislatively authorized which it had not been before, but with considerably sharpened focus, limiting it to advice on eligibility matters only. The other was that Congress amended the General Education Provision Act to prohibit government interference in accrediting agency activities as it also prohibited government interference in the curriculum and internal activities of institutions.

Subsequent to 1980, with the change in leadership of the Council and of the Department of Education Division of Eligibility and Agency Evaluation, the situation changed radically and, as indicated in the document on relations to the federal government, it moved into a period of cooperation rather than confrontation.

In spite of the internal concerns with structure and the external concerns with the role of the federal government and accreditation, the Council was active during this period in policy development on the one hand, and carried out a series of extraordinarily important studies on the other. First, in the area of policy development, as a result of a joint task force, the Council on

Postsecondary Accreditation and the Council of Graduate Schools in the United States issued a joint policy statement on "Accreditation of Graduate Education." A critically important policy statement on "Transfer and Award of Academic Credit" was developed in cooperation with the American Council on Education Commission on Educational Credits and Credentials and the American Association of Collegiate Registrars and Admissions Officers. It was approved by the COPA Board on October 10, by the American Association of Collegiate Registrars and Admissions Officers on November 21 and by the American Council on Education Commission on Educational Credits and Credentials on December 5, 1978. An initial statement on "Accreditation of Off-Campus Educational Programs" was adopted in 1976. It has been superseded by a more recent statement (1983); however, this along with the "Memorandum of Agreement" of the regional accrediting bodies adopted in 1978, and the statement of Procedures of 1982, addressed not only the general issue of off-campus programs, but inter-regional programs as well. Another critically important policy statement on "Accreditation and the Public Interest" which served, among other things, as a basis for modifying the recognition criteria to require public representation on accrediting commissions, was developed by an appropriate ad hoc committee and adopted by the COPA Board in April of 1980. Finally, as already noted, the policy statement on "Accreditation and Eligibility for Federal Funds" was also adopted in 1980.

During this period, three critically important studies were undertaken and completed. The first, done with the support of the Kellogg Foundation, was a major study on assessing nontraditional education. It was completed in 1978 under the direction of Dr. Grover J. Andrews. It resulted in a four volume report entitled, "Assessing Nontraditional Education," whose conclusion was that the principles involved in assessing nontraditional education should essentially be the same as those in traditional education. In both, however, considerably more emphasis should be placed on results or outcomes.

The second was a major study supported by the Department of Defense, under the direction of Dr. Jack Allen and Dr. Grover Andrews, which involved case studies of off-campus postsecondary education operations on military bases. The case studies involved 25 bases and 54 different evaluators. The bases were both from the continental United States and overseas, and included military installations in all of the services. The approach was one of base-wide evaluations, including the institutions operating on the base, education service officers and military support. A series of recommendations came out of the report, a number of which have been adopted by the Armed Services and by regional accrediting associations. The report has served as the basis for current development of programs of base-wide evaluation in the Navy, the Air Force, and the Army. Among other things it played an important role in bringing about the development of the Department of Defense Directive 1322.8, which serves as a kind of Magna Charta for voluntary education in the military. The final report of The Case Study of Off-Campus Postsecondary Education on Military Bases was published in January 1980.

The third important study, carried out by Dr. Herbert Kells and Dr. Richard M. Parrish, was a study of Multiple Accreditation Relationships of Postsecondary Institutions in the United States. The report developed basic information on the patterns of multiple accreditations of individual institutions, the number of institutions with such multiple accreditations and the range of multiple accreditations by type and size of institution. This has served as a basic reference and is currently being brought up-to-date.

The first five years came to a close with the resignation of Dr. Kenneth Young as President to accept the position as president of the National University of Continuing Education Association in 1980 and the authorization by the Board to undertake the first major self-study. The self-study was delayed until after the appointment of a new President in February of 1981 and occurred during the summer of 1981.

II. Activities from 1982 to 1986
Related to Priorities adopted in 1982

The following table lists the priorities proposed by the 1981 Self Study Advisory Panel and adopted by the Board, with major subsequent actions related to each priority. The actions are roughly divided between "Policy Statements, Reports and Projects" and "Other Activities".

1981 Priorities	Policy Statements, Reports and Projects	Other Activities
1. Create awareness of values, role and activities of accreditation among institutions, faculties, trustees, state and federal government, and the general public; develop understanding and support for the accrediting process among its publics.	Relevant policy statements: - "Role and Value of Accreditation" - "Rights and Responsibilities of Institutions and Accrediting Bodies in the Accrediting Process" - Educational Quality and Accreditation: A Call for Diversity, Continuity and Innovation - The Role of Accreditation in Directly Improving Educational Quality (Steven Jung) Publications (acticles, etc.) in: - New Directions in Higher Education (Jossey Bass) No 43 No 46 - Educational Record - State Education Leader - Change - Journal of Education for Library and Information Science - Nursing and Health Care - Journal of Legal Education	Presentations (speakers, consultations, etc.) - Higher education organizations Annual Meetings: ACE AGB CGSUS AAHE AASCU AACRAO ASHE NUCEA NACUA - Board, Policy Committees, etc. NASULGC NAFSA CASE AASCU Carnegie Foundation for Advancement of Teaching Regular Publications: - Accreditation - The President's Bulletin - Balance Wheel - Accredited Institutions of Postsecondary Education - Bibliography on Postsecondary Accreditation - "Annual Publications of Dissertations and Research in Accreditation"
2. Development of an adequate and functional data base for COPA and the accrediting community: establishment of a system for collecting and providing more relevant and organized supportive information for the accrediting community, institutions and the publics of accreditation.	- Annual questionnaire of agencies on actions etc. - Biennial publication of A Guide to COPA Recognized Accrediting Agencies - Common Date Base Project (funded by Ford Foundation) A Common Language for Postsecondary Accreditation: Categories and Definitions for Data Collection Project developed with NCHEMS ($254,794 over two years)	Proposal for developing software to go with the Common Data Base for institutional use before the MacArthur Foundation. Regionals developing compatible data base formats - Both institutional and specialized accrediting bodies utilizing A Common Language as they revise data request documents.

3. Relations of Accreditation to Government a. Relations with the Federal Government: Increase cooperation	Division of Eligibility and Agency Evalution (DEAE): - Review of similiarity of criteria for recognition - Development of procedure for submission of common document by accrediting bodies being reviewed by both COPA and DEAE within reasonable time frame. - Proposal by DEAE to shift to 5 year review period to correspond to COPA 1978 Policy Statement on Accreditation and Eligibility (still operative)	Testimony: House Subcommittee on Postsecondary Accreditation; written testimony to Senate Subcommittee on Education, Arts and Humanities. Monthly meetings of COPA and DEAE staff during Richard Rowe's directorship. National Advisory Committee to Secretary on Accreditation and Institutional Eligibility - COPA staff invited to attend. - Testimony when appropriate. - Serve in advisory capacity under current and previous chairs. - Move to accept COPA recognition in lieu of DEAE recognition proposed but not implemented. - Move to restrict Federal recognition to institutional accredition involving free standing professional accrediting bodies proposed but not implemented.
b. Relations to State Government: Need for more objective communication, definition and balancing of roles, and mutual understanding.	FIPSE Joint Project of COPA and SHEEO on Long Distance Learning via Telecommunications ($229,704) Policy statement on Accreditation and Authorization of Distance Learning Through Telecommunications. AASCU Publications (AASCU studies) "Quality on Campus: Whose Responsibility?" Millard and Gubser. CGSUS "State and Regional Relations with Universities and Institutions and Accreditation" Proceedings, 21st Annual Meeting (1981)	Involvement in and presentations at each annual SHEEO Meeting. Development of joint COPA/SHEEO Liaison Committee. Other meetings and presentations with state groups: PROANDI NASAA ECS-Advisory Commission Individual states: AL AR CA CO FL MD MN NC OH OK PA TN TX VA Testimony: National Governor's Association Committee on Quality of Undergraduate Education (Gov. Ashcroft)

4. Institutions', programs' and accrediting associations' rights, responsibilities, and concerns with accreditation.	Task Force - Policy Statements: "Rights and Responsibilities of Accrediting Bodies and Institutions in the Accrediting Process" 1985 (over 10,000 distributed) "Trustee Involvement in the Accreditation Process" 1984 "Evaluation of Accrediting Activities by Institutions" 1983 "Accreditation and the Public Interest" 1980 (still operative) "Off-Campus Credit Programs" 1983 "Principles of Good Practice in Institutional Advertising, Student Recruitment, and Representation of Accredited Status" 1983 "Considerations When Closing a Postsecondary Educational Institution" 1982	Other publications: - "Self-Regulation and the Accrediting Community" in Proceedings, 1982 Annual Meeting, Accreditation Board for Engineering and Technology. Professional Development sessions on: - Due Process: - Selection, Training and Evaluation of Evaluators - Accreditation and the States: Responsibility for Quality Education
5. Specialized Accreditation and Interagency Cooperation.	"Guidelines on Interagency Cooperation in Accreditation" 1980 Common Data Base Project - A Common Language for Postsecondary Accreditation: Categories and Definitions for Data Collection. 1985.	Other publications: - "Specialized Accreditation: Public Policy Issues and COPA" in Proceedings: Forty-Third Annual Meeting, Accrediting Board for Engineering and Technology, 1985. - "Whither Accreditation in the Health Professions?" Educational Record, Fall 1984. - Revision and update of Kells and Parrish Multiple Accreditation Relationships of Postsecondary Institutions in the United States (originally published in 1979.)

6. Reassessment of Confidentiality	Policy Statement: "Disclosure, Confidentiality, and the Integrity of the Accrediting Process" 1984. Developed by an Ad hoc Committee over a three year period.	
7. Regularly review the standards and criteria employed by accrediting agencies and encourage them when possible to adopt standards that are defined in terms of educational outcomes and results.	Policy Statement: "Validity and Reliability of Accrediting Standards". Guidelines for determining the validity and reliability of accrediting standards and process.	Regular and continuing review of accrediting bodies and their standards by the Recognition Committee. Current review of COPA recognition provisions for validity and reliability - modification of criteria in the light of such review. Pilot tests of validity and reliability guidelines by North Central, National Association of Schools of Music, and Western Association Accrediting Commission for Community and Junior Colleges. Regional Meetings - Chicago and DC on validity and reliability (1986). Professional development sessions on outcomes and results - 1983 and 1986. COPA/ABA Liaison Committee to review common areas of concern related to standards
8. Undertake a broad review of accreditation services to education and the public as they relate to its functions and structures in changing internal and external environment.	Educational Quality and Accreditation: A Call for Diversity, Continuity and Innovation, 1986. Educational Advisory Panel. The Role of Accreditation in Directly Improving Educational Quality, 1986. Report of study by Steven M. Jung financed by Department of Education. Carried out under COPA supervision.	

9. Issues of national importance involving accreditation		
a. Innovative, nontraditional and continuing education programs: quality control, flexibility and transferability.	Policy and Publications: Will My Credits Transfer? "Joint Policy Statement on Transferability of College Credit" [continuing interpretation and correspondence related to joint statement - reconsideration and reaffirmation, 1984]	Continuing involvement with issue of transferability (Servicemembers Opportunity College, correspondence about national institutional accrediting bodies). Involvement with National University Continuing Education Association.
b. Off-campus, out-of-state and interregional programs and impact of technologies: interregional cooperation, quality control and relation to state authorizing and planning agencies.	Policy Statements and related activities: "Off-Campus Credit Programs" 1983 "Accreditation and Authorization of Distance Learning Through Telecommunications" 1984 - including development of institutional profile for use by accrediting bodies and state agencies. Adoption by regional accrediting bodies of "Procedures for the Evaluation of Institutions Operating Interregionally" 1982.	COPA/SHEEO Liaison Committee relations with PROANDI, etc. on state level. Current process of revision of 1977 "Memorandum of Agreement on Accreditation and Off-Campus Activities" by regional accrediting bodies. Special negotiations in California to preserve principle of interregional reciprocity.
c. Education of the Military.	"Program for Evaluation of Voluntary Education on Military Installations by Accrediting Associations" Navy - 1984 Air Force - 1985 Army - 1986	Pilot programs of base-wide evaluation: Navy, 3 institutions (1985-86) Air Force, 6 institutions (1986-87) Army, 3 institutions (1987) Conferences with Air Force Bad Kissingen, Germany, 1983 Homestead, Florida, 1985 Consultations with Department of Defence on: 1. Revisions in general statement of the purposes and nature of voluntary education programs on military bases (DOD Directive 1322.8) 2. Inclusion of all COPA recognized agencies, in voluntary education program. 3. Modifications in Servicemembers Opportunity College (SOC), contract and criteria Representation on SOC Board

COPA OBJECTIVES AND WORK RESPONSIBILITIES

The following is an analysis of the various staff supported activities related to the three primary Council objectives plus their general administrative support. The analysis also includes appropriate budgetary allocations related to the various goals, objectives and activities (1985-86 budget).

I. GOAL: Recognize accrediting associations that accredit institutions and programs of postsecondary education on the basis of demonstrated need and specified standards related to accrediting policies and practices. Total Goal Allocation $129,071.

OBJECTIVE: Provide the Provisions and Procedures

ACTIVITY: Develop, update and review the Provisions and Procedures.

TASK: Develop the Provisions and Procedures via the Committee on Recognition and Board.

TASK: Update periodically the Provisions and Procedures through staff and Committee on Recognition review with suggested revisions by the Assemblies and final approval by the Board.

OBJECTIVE: Apply the Provisions and Procedures

ACTIVITY: Coordinate the operation and meetings of the Committee on Recognition.

TASK: Coordinate Committee and reviewer preparation.

TASK: Coordinate reader selection and preparation.

TASK: Schedule and coordinate Committee on Recognition meetings.

ACTIVITY: Provide information and/or interpretation or the standards and/or process to inquiring parties.

ACTIVITY: Interpret the Provisions and Procedures to bodies involved in some stage of review.

ACTIVITY: Develop specific guidelines concerning the detailed coordination of the recognition process and prepare a Handbook of same for the Committee on Recognition.

TASK: Develop such specific guidelines as:

- Guidelines for Reader-Consultants Engaged in the Recognition Process
- Guidelines for Visits to Agencies Engaged in the Recognition Process

- The Role of Adjunct Members on the Committee on Recognition

- Guidelines for the Committee on Recognition Relative to Recognition Actions

- The Role of Reviewers for Agency Applications

- Review of Interim Reports

- The Pre-application Process

- Review of Pre-Applicant Materials

ACTIVITY: Coordinate discussion among affected bodies on any issues or concerns related to the recognition process.

ACTIVITY: Coordinate the four states of recognizing accrediting associations: pre-application, initial and continuing recognition, interim reports, and change in scope.

Stage I: Pre-Application

TASK: Coordinate the pre-application process for associations desiring to apply to COPA for initial recognition. The elements of this process include but are not limited to:

- Holding initial staff meetings with all pre-applicant groups for purposes of interpreting the guidelines and coordinating the general schedule of the process,

- Receiving and processing association application materials,

- Appointing reviewers from the Committee on Recognition,

- Scheduling the pre-application review for each phase of the process,

- Providing guidelines and review materials to the Committee on Recognition for their April and October review sessions,

- Communicating the Committee discussion with the pre-applicant(s) and holding periodic staff meetings with all pre-applicant groups as needed,

- When appropriate, encouraging the pre-applicant to begin application for initial recognition.

Stage II: Initial and Continuing Recognition

TASK: Develop, follow and update a master schedule of initial and continuing recognition reviews for associations.

TASK: Schedule and monitor the recognition review sessions held in April and October of each year. (An average of six associations are reviewed each session, or 12 per year.)

SUBTASK: Develop, review and follow the 26-step process designed for communicating with associations undergoing review and preparing the Committee on Recognition for the reviews, including but not limited to:

- Providing and interpreting the provisions, procedures and guidelines to associations involved in the review process,
- Notifying and collecting the associations' "intent to apply",
- Developing a reader-consultant pool,
- Nominating appropriate people to act as outside reviewers for each association,
- Receiving and processing the associations' choice of reader-consultant,
- Appointing reader-consultants and supplying them with appropriate materials and scheduling information,
- Receiving and processing association application materials,
- Receiving, acknowleding and processing written third party testimony, and scheduling oral testimonies,
- Announcing the reviews in appropriate publications (e.g., Chronicle and Accreditation),
- Assigning primary and secondary reviewer roles to members of the Committee on Recognition and,
- Establishing the review materials to the Committee on Recognition for each three-day review period.

SUBTASK: Act as resource staff to the Committee on Recognition through the process.

SUBTASK: Notify agencies of the recommendation for continued recognition and hold interpretive meetings for them when necessary.

SUBTASK: Collect the association response to and refine and process the Committee on Recognition recommendation for continuing recognition for Board approval.

SUBTASK: Announce final action of the Board in Board minutes and appropriate publications.

Stage III: Interim Reports

TASK: Coordinate the process by which recognized associations are on occasion requested by the Board to submit a report between scheduled reviews.

SUBTASK: Receive, process and schedule the reports for Committee on Recognition review.

SUBTASK: Notify the association of the Committee's response and develop the appropriate report to the Board for its review and approval.

SUBTASK: Announce final action of the Board in Board minutes and appropriate publications.

Stage IV: Change of Scope

TASK: Coordinate the process which recognized associations undergo when seeking recogninition for a change in scope.

The elements of this process include but are not limited to:

- Holding staff meetings or conducting formal communications with associations for purposes of interpreting the guidelines and coordinating the general schedule of the process,

- Receiving and processing association application materials,

- Appointing reviewers from the Committee on Recognition,

- Providing guidelines and review materials to the Committee on Recognition for their April and October review sessions,

- Communicating Committee discussion with the applicant(s) and holding staff meetings as needed,

- When appropriate, encouraging the applicant to begin application for recognition of a change of scope.

II. GOAL: Provide national leadership and understanding in speaking for accreditation. Total Goal Allocation $110,872.

OBJECTIVE: Cultivate a broad understanding of accreditation

ACTIVITY: Provide general information

TASK: Prepare articles for national publications (Change, Chronicle, New Directions, Legal Education, etc.)

TASK: Make presentations at national and regional meetings

TASK: Answer oral and written inquiries

TASK: Prepare and distribute policy statements and position papers

TASK: Provide regular publications: Accreditation, "President's Bulletin" and Balance Wheel

TASK: Inform and meet with representatives of foreign countries

SUBTASK: International correspondence

SUBTASK: Inquiries from Embassies

SUBTASK: Foreign visitors (individual and delegations)

OBJECTIVE: Serve as spokesman for accreditation at the national level

ACTIVITY: Represent accrediting community in national forums

TASK: Congressional testimony and liaison

TASK: Service on national committees, commissions, etc.

OBJECTIVE: Interact with interested parties concerned with accreditation

ACTIVITY: Interact with educational institutions

TASK: Answer institutional inquiries and inquiries about institutions

TASK: Provide appropriate publications

TASK: Deal with institutional concerns related to accrediting associations

TASK: Involve institutional representation on committees, task forces, etc.

TASK Work with departments and centers for higher education concerned with accreditation

ACTIVITY: Interact with foundations

TASK: Develop proposals

TASK: Supply information

TASK: Advise on request (e.g., Ford, Exxon, Carnegie, etc.)

ACTIVITY: Interact with Federal Government agencies

TASK: Congressional Liaison

TASK: Department of Education

SUBTASK: Liaison with Secretary and Office of Secretary

SUBTASK: Liaison with DEAE

- periodic meetings
- joint reviews
- special projects
- information exchange
- joint presentations
- Advisory Committee to the Secretary

SUBTASK: Liaison with National Center for Education Statistics (National Advisory panel)

TASK: Liaison with Department of Defense

SUBTASK: Meetings with service education directors

SUBTASK: Planning for accreditation coordination

SUBTASK: Regional, national and overseas meetings with Education Service Officers (ESO)

SUBTASK: Liaison with State Advisory Committees on Military Education (ACME)

SUBTASK: Information Exchange

SUBTASK: Servicemembers Opportunity College representation and consultation

TASK: Liaison with other federal departments, including responses to information requests

ACTIVITY: Interact with State Government agencies

TASK: Liaison with State Higher Education Executive Officers (SHEEO)

SUBTASK: SHEEO/COPA Liaison Committee

SUBTASK: SHEEO Committees: Executive Committee, Committee on Accreditation

TASK: Liaison with authorization and oversight agencies

- Persons Responsible for Oversight and Authorization of Non-public Degree-Granting Institutions (PROANDI)

- National Association of State Approval Agencies for the VA (NASAA)

- National Association of State Supervisors and Administrators of Private Schools (NASSAPS)

SUBTASK: Information and Clearinghouse activities

SUBTASK: Consultations and Meetings

TASK: Meetings with state groups (Ohio, California, Maryland, Florida, etc.)

TASK: Response to state inquiries

SUBTASK: State studies of accreditation (California, Arizona, Texas)

SUBTASK: State agency requests for information on specific accrediting issues (e.g. West Virginia, Florida, etc.)

ACTIVITY: Liaison with other organizations and groups

TASK: Membership in and involvement with Higher Education Secretariat including Committees

TASK: ACE Commissions and Committees

SUBTASK: Commission on Educational Credits and Credentials (Membership)

SUBTASK: Committee on Self-Regulation (Membership)

SUBTASK: Council on State Relations (Membership)

SUBTASK: Association Council for Policy Analysis and Research (Membership)

SUBTASK: Commission on Adult Education and Life Long Learning (Advisory)

SUBTASK: Office on Women in Higher Education (Advisory)

SUBTASK: Division of Policy Analysis (Advisory)

TASK: Liaison with non-ANPEO Secretariat organizations

SUBTASK: Committees and special projects

SUBTASK: Participation and presentations at annual and special meetings (CGSUS, AACRAO, NUCEA, etc.)

SUBTASK: Answering inquiries

SUBTASK: Exchange of publications

TASK: Liaison with other organizations

SUBTASK: Organizations related to accreditation (e.g. Association of Academic Health Centers, American Society of Allied Health Professionals, etc.) Meetings, consultations, special projects.

SUBTASK: Organizations indirectly related to accreditation (e.g. National Association of Foreign Student Affairs, continuing education groups, etc.)

SUBTASK: Other accrediting groups (e.g. CORSAC)

III. GOAL: Provide services to accrediting associations, postsecondary institutions, and the public. Total Goal Allocation $223,177.

OBJECTIVE: Assist in improving the general accrediting process as well as the policies and practices of recognized associations.

ACTIVITY: Develop policy related to improvement of accrediting processes, policies and practices

TASK: Committee on the Public Interest

TASK: Assemblies' review of policy positions, statements and proposals related to procedures

TASK: ANPEO activities representing institutional concerns

TASK: Ad Hoc Committees on policy issues related to improvement of the accrediting process

- Disclosure and confidentiality
- Accreditation of off-campus programs
- Institutional evaluation of accrediting process
- Validity and Reliability
- Classification of accrediting associations
- Rights and responsibilities

ACTIVITY: Assume responsibility for other activities related to improvement of policies and procedures of accrediting associations

TASK: Consultations with staffs of accrediting associations on standards, policies and procedures

TASK: Developing implications of legal decisions and other public law or policy decisions

TASK: Improving oversight of voluntary education of the military

ACTIVITY: Provide accrediting association staff professional development opportunities

TASK: Conducting meetings of the Professional Development Committee

TASK: Providing day-long development programs held in conjunction with semi-annual meetings

TASK: Planning regional meetings around issues of common concern

ACTIVITY: Maintain liaison between institutions and programs with respect to accrediting policies and procedures and accrediting associations

OBJECTIVE: Facilitate coordination among accrediting associations

ACTIVITY: Support and coordinate COPA Assemblies

TASK: Prepare agendas

TASK: Prepare background materials

TASK: Follow-up on recommendations and actions

TASK: Support Assembly Committees and Subassembly meetings

TASK: Support Combined Assembly meetings and activities

ACTIVITY: Encourage and reinforce inter-association cooperation

TASK: Develop and implement policy

TASK: Develop common data bases

TASK: Increase institutional awareness

TASK: Consult with accrediting associations

ACTIVITY: Maintain constructive involvement with accrediting associations

TASK: Meet with accrediting commissions, committees, and boards

TASK: Meet with accrediting association staffs

TASK: Provide information and advice to accrediting association on matters of mutual concerns (letter and phone)

TASK: Arrange interassociation meetings and consultations (E.g. NAPNES-NLN)

ACTIVITY: Increase awareness of issues in accreditation among accrediting associations and member national postsecondary organizations.

TASK: Attend and make presentations at annual and other national meetings

TASK: Prepare "President's Bulletin"

TASK: Prepare papers and background materials for national postsecondary organizations (ANPEO members)

OBJECTIVE: Encourage, sponsor, conduct, and publish research relating to understanding and improvement of accreditation

ACTIVITY: Sponsor funded projects--e.g., Assessing Long Distance Learning Via Telecommunications (joint project with SHEEO; funded by FIPSE), Common Accreditation Data Base (joint project with NCHEMS; funded by Ford Foundation)

TASK: Prepare and submit proposals

TASK: Provide administrative liaison to project staff

TASK: Participate in deliberations of task forces and committees

TASK: Develop and disseminate reports

ACTIVITY: Coordinate preparation of Bibliography on Postsecondary Accreditation

TASK: Oversee editors' efforts; update entries as needed

TASK: Publish and disseminate book

ACTIVITY: Publish occasional papers and reports--e.g., "A Study of the Role of Accreditation in Directly Improving Educational Quality" (Steven Jung), "Toward Academic Quality Off-Campus" (Eileen Kuhns and S. V. Martorana)

TASK: Encourage authors to conduct research and prepare reports

TASK: Publish, promote and distribute publications

ACTIVITY: Develop accreditation research network

TASK: Prepare listings of current dissertations and other relevant research

TASK: Distribute listings annually to higher education program directors and COPA membership

ACTIVITY: Prepare and distribute questionnaires and analyses of results

TASK: Conduct annual survey of member accrediting bodies

TASK: Carry out surveys related to ad hoc committees and task forces--e.g., Committees on Accreditation of Foreign Institutions, Validity and Reliability, Disclosure and Confidentiality

OBJECTIVE: Publish other information about accreditation

ACTIVITY: Prepare, publish and distribute Accreditation, quarterly newsletter sent to chief executive officers of all accredited institutions of postsecondary education

ACTIVITY: Prepare, publish and distribute President's Bulletin, monthly newsletter for member accrediting bodies

ACTIVITY: Prepare, publish and distribute COPA's annual directory, the Balance Wheel for Accreditation

ACTIVITY: Prepare, publish and distribute Guide to COPA Recognized Accrediting Bodies, biennial factbook of basic information concerning member organizations

ACTIVITY: Assist ACE editor in preparation and publication of annual guide to Accredited Institutions of Postsecondary Education

ACTIVITY: Prepare, publish and distribute materials relevant to Council operations

TASK: Develop "Board Books," agendas for semiannual meetings

TASK: Print policy statements in brochure form and maintain policy books for members

TASK: Print Provisions and Procedures for Recognition

TASK: Prepare work papers or other special reports

ACTIVITY: Prepare, publish and distribute promotional materials

TASK: Develop promotional brochure to include description of COPA's function and organization chart

TASK: Maintain publications list

TASK: Disseminate subscription information to potential interest groups

ACTIVITY: Develop relations with media through press releases and personal contacts

SYNOPSIS

I. GOAL: Recognition

A. Objective: Provide Provisions and Procedures

1. Activity: Develop, update and review Provisions and Procedures

B. Objective: Apply Provisions and Procedures

1. Activity: Coordinate operation and meetings of Committee on Recognition

2. Activity: Provide info to inquiring parties

3. Activity: Interpret provisions to bodies in review

4. Activity: Develop guidelines

5. Activity: Coordinate discussions among bodies

6. Activity: Coordinate 4 stages of recognition process

Task: Pre-application

Task: Initial and continuing recognition

Task: Interim reports

Task: Charge of scope

BUDGET CATEGORIES	BUDGET ALLOCATION
Salaries	$ 80,475
Prog Dev, Bd - Exec Comm Mtgs - Task Force, Bd - Comm Assembly Mtgs-	10,948
Comm on Recognition	12,000
Staff Travel (10%)*	1,800
Publications (3%)**	600
Equipment	2,380
Office Expenses	15,965
Prof Services	3,332
Other Expenses	1,571
Total Goal Allocation	$129,071

	BUDGET CATEGORIES	BUDGET ALLOCATI
II. GOAL: Provide National Leadership	Salaries	$ 69,316
A. Objective: Cultivate a broad understanding	Prog Dev, Bd - Exec Com Mtgs -	9,430
1. Activity: Provide general information	Task Force, Board - Comm Assembly Mtgs-	
B. Objective: Serve as spokesman	Comm on Recognition	
1. Activity: Represent accrediting community in National Forums	Staff Travel (45%)*	8,10
C. Objective: Interact with parties concerned with accreditation	Publications (20%)**	4,00
	Equipment	2,050
1. Activity: Interact with educational institutions	Office Expenses	13,75
2. Activity: Interact with Foundations	Prof Services	2,870
3. Activity: Interact with government agencies	Other Expenses	1,35
Subactivity: Federal government		
Subactivity: States	Total Goal Allocation	$110,872
4. Activity: Liaison with other organizations and groups		

III. GOAL: Provide services to accrediting associations, PSE institutions, public

A. Objective: Improving accrediting process, policies, procedures

1. Activity: Develop policy related to improvement

2. Activity: Other activities related to improvement

3. Activity: Provide accrediting associations staff development

4. Activity: Liaison between institutions and programs, accrediting policies and associations

B. Objective: Facilitate coordination among accrediting associations

1. Activity: Support and coordinate Assemblies

2. Activity: Encourage and reinforce inter-association cooperation

3. Activity: Involvement with accrediting associations

4. Activity: Increase awareness of issues among accrediting associations and ANPEO

C. Objective: Encourage, sponsor, and conduct research

1. Activity: ALLTEL (Restricted funds not included in COPA budget - see attached breakdown)

2. Activity: Proposal for common data-base

3. Activity: Occasional papers and reports

4. Activity: Develop accreditation research network

BUDGET CATEGORIES	BUDGET ALLOCATION
Salaries	$141,675
Prog Dev, Board, Exec Com Mtgs - Task Force, Board - Comm Assembly Mtgs-	19,274
Comm on Recognition	
Staff Travel (35%)*	6,300
Publications (75%)**	15,000
Equipment	4,190
Office Expenses	28,107
Prof Services	5,866
Other Expenses	2,765
Total Goal Allocation	$223,177

	BUDGET CATEGORIES	BUDGET ALLOCATI
IV. GOAL: Provide Administrative Services	Salaries	$ 46,661
A. Objective: Planning and Coordination	Prog Dev, Board, Exec Com Mtgs	
B. Objective: Fiscal Operations	Task Force, Bd Comm, Assembly Mtgs	6,348
C. Objective: Office Administration	Comm on Recognition	
D. Objective: Personnel Administration	Staff Travel (10%)*	1,80
E. Objective: Meeting Planning and Operation	Publications (2%)**	40
F. Objective: Admininstrative Liaison with NCHE	Equipment	1,380
	Office Expenses	9,25
	Prof Services	1,932
	Other Expenses	91
	Total Goal Allocation	$ 68,689
	TOTAL BUDGET	$531,809

* Specified allocation based on R. Millard's goal allocation of staff time.

** Specified allocation based on J. Froom's goal allocation of staff time.

GOVERNANCE

Athough the various governance structures in the history of COPA, including those of its predecessors, are outlined in the accompanying governance and finance tables, some additional explanation is called for. As can be seen from the first two tables, the initial governance structure, to a large extent, was a merger of the FRACHE and the NCA Boards. There were, however, some major differences. For example, in the light of the fact that dues were no longer directly collected from institutions, as was the case under NCA, the number of representatives of the institutional organizations was reduced by two-thirds to one representative per national higher education organization. However, because the national organizations continued to have representation on the COPA Board, they did agree to make a nominal contribution to COPA financing of $1,000 per association. This constituted about 3% of the initial budget.

The regional accrediting bodies also had one representative less than their representation in FRACHE. Under the COPA structure, each of the regionals was represented by two members. This constituted the largest single block (one-third) of members of the board. However, to the 12 representatives appointed by the regional commissions were added four members representing the national institutional accrediting bodies. Together, then, the institutional accrediting bodies accounted for 16 votes or 45% of the representation on the Board.

It should be noted that the institutional accrediting bodies carried by far the largest portion of the financial support for the Board (85%). While the issue of proportional representation in relation to dues was not a major issue at this time, it did become a matter of concern relatively early in the history of the Council (1978-1980).

The specialized accrediting agencies gained one seat, going from three to four, thus being represented by one-eighth of the members of the Board. It also should be noted that at that time the only elected members of the Board were the four representatives of the specialized accrediting bodies elected by the Council on Specialized Accrediting Agencies.

The proportion of public members on the new Board was essentially the same as that on the FRACHE Board, however, the distribution was different. Four of the nine public members were scheduled to be appointed by other agencies: two by the Education Commission of the States, one by the Advisory Committee of the Office of Education, and one by the Association of Governing Boards. The other five were to be elected at-large by the Board itself. The appointment of the two members by the Education Commission of the States was designed to assure state political representation among the public members. Of those initial members of the board appointed by ECS, one was a former Governor and the other a member of the Maryland Legislature. Although the Chairman of the Advisory Committee on Accreditation and Institutional Eligibility attended the first meeting, the Commissioner of Education declined to appoint a member of the Board on the grounds of possible conflict of interest. The Association of Governing Boards appointed a trustee, and thus had representation on a par

with the other national higher education organizations, as was the case in the National Commission on Accediting.

It was recognized from the outset that the Board structure was somewhat unwieldy, that there were problems of proportionate representation, that the Board was perhaps larger than it should be, and that thus the Board structure should be given further consideration in the view towards reorganization. Accordingly, at this first meeting of the Board a Task Force on Structure and Bylaws was set up to begin such an examination.

The Task Force reported in 1978 and a number of the recommendations of the task force were adopted. In the original structure there had been no provisions for the members of the accrediting community to meet together either to share information and discuss issues of common concern or to relay their concerns to the Board. Among the most important recommendations of the task force adopted by the Board was the establishment of the two Assemblies, the Assembly of Institutional Accrediting Bodies and the Assembly of Specialized Accrediting Bodies. While these Assemblies were not policy making or legislative bodies, they were intended to facilitate discussion and consensus building among the members. The Assembly of Specialized Accrediting Bodies in particular took over the function formally held by the Council on Specialized Accrediting Agencies of electing members to the COPA Board. This meant, among other things, that the Council on Specialized Accrediting Agencies had to redefine its role outside of the Council. It devoted much of its attention to professional development and general concerns with the issues of specialized accreditation as related not only to the COPA recognized specialized accrediting agencies, but others recognized by the Office of Education but not part of the Council.

Rather than reducing the number of members of the COPA board, the 1978 revision actually increased the number, at least on paper, to 40, and reassigned some positions. The number, for example, of representatives of the Assembly of Specialized Accrediting Bodies increased from four to nine, including one staff position. A staff position was also added to the Board for the regional accrediting commissions and for the national accrediting commissions. The number of public positions was reduced to four and in this reduction, now with the Office of Education, the Education Commission of the States and the Association of Governing Boards all lost the opportunity to name members to the Board. Two positions remained unassigned; thus for practical purposes the number of Board members was 38 rather than 40.

The 1978 revision also called for two standing committees of the Board. One was the Recognition Committee which, while it was made up wholly of Board members, included staff members on the Board. The second was a Finance Committee, which was directed among other things to develop a new finaning plan. The Chairman of the Recognition Committee and Finance Committee were added as ex-officio members to the Executive Committee.

It was at this point that the issue of representation as it relates to proportionate dues paid began to become a matter of some concern. The Finance Committee reported in 1980 and recommended what it called the "parity" plan. This was based upon the assumption that approximately half of the institutional funds spent on accreditation are expended in relation to institutional accreditation and that approximately half are spent in connection with professional and specialized accreditation. The institutional accrediting bodies, in particular, felt that they were paying a far greater portion of the expenses than was desirable, and that they either should have representation on the Board reflecting this, or that the proportionate share of their dues should be lowered. The Finance Committee recommended a plan whereby 45% of the dues would come from institutional accrediting bodies, 45% of the dues from the specialized accrediting bodies and 10% of the dues from the national organizations. Along with this a different basis for determining the amount of dues per accrediting body was proposed. For the institutional accrediting bodies, it was recommended that the basis for payment be the size of the accrediting budget, not the number of institutions accredited. It was believed that this in principle could apply to the specialized accrediting bodies as well. This would mean, in effect, that a millage based on association expenditure as related to the COPA budget requirements would constitute the basis of an assessment. In addition, each accrediting body would pay a sustaining fee of $2000 and the national higher education organizations a sustaining fee of $5000.

By this time, the discussion of a need for a major self-study of the Council was already underway. Accordingly, the Board adopted the report in principle but delayed implementation until after the self-study was completed. The finance plan from the beginning had a number of problems. One was a lack of comparability even among the institutional accrediting bodies in their own budgeting processes. While all or most of the expenditures of the regional accrediting bodies were for accreditation, this is not true of such organizations as the Association of Independent Colleges and Schools and the National Association Trade and Technical Schools, where significant portions of the expenditures were for other than accrediting purposes in strengthening the field itself. The non-comparability went even further in relation to specialized or professional accrediting bodies, where the very income basis differed radically not only among specialized accrediting bodies, but with institutional accrediting bodies. In some instances the programs made no contribution whatsoever to the income of the accrediting units. Under any circumstances, this budgeting plan meant a radical increase for the specialized accrediting bodies, with the cost falling heavily upon a relative few of the professional groups. Later under the self-study, a special study of the possibility of feasibility of such a dues structure was undertaken by Peat, Marwick and Mitchell. This study made it clear that, while it was theoretically possible to develop a millage system based upon expenditures, it was practically impossible given the types and varieties of budgeting processes involved and the question of equity as it related to accreditation income and expenditures. The Finance Committee had also recommended that the

parity plan should extend to proportionate representation on the Board, with a 45, 45-45-10 structure. Before the 1981 Self-Study began, it was recognized that the recommendations of the Finance Committee perhaps raised more serious problems than they solved.

The first President of the Council, Kenneth Young, resigned in 1980, and a new president took over as of the 1st of February, 1981. A distinguished Self-Study Panel, chaired by Dr. Howard Bowen of the Claremont Graduate Schools, was appointed and the self-study got underway in the summer of 1981. It reported to the Board in October of that year, and the major recommendations of the Self-Study Panel as they related particularly to governance were adopted. The significant parts of the report were adopted by the Board in October of 1981. The bylaws were changed in April of 1982 and the new structure went into effect the first of July. The nature of the change was such that, in effect, it meant that the Board had to have enough courage to replace itself. This it did by adopting all of the Advisory Panel recommendations in relation to governance, except for a proposed change in the name from "Council" to "Commission."

The Advisory Panel was concerned with a number of things. Among these was the concern that the structure of COPA should reflect the involvement in self-regulation by institutions and programs that is characteristic of accreditation. If this is the case, then the Board of COPA should not be appointed by particular interest groups, but should be elected by those most concerned to insure that accreditation is effective. The structure should provide a unity and integrity to COPA through full and equitable participation and involvement of educational institutions, institutional and specialized associations, national postsecondary educational organizations and representatives of the public. Specifically, it proposed that the size of the Board be reduced from 40 to 15 elected members plus four ex officio members. Three of these were to be elected by the Assembly of Institutional Accrediting Bodies, three by the Assembly of Specialized Accrediting Bodies, and three by a new Assembly of National Postsecondary Educational Organizations. Three chief executive or academic officers of institutions were to be elected by the Board at-large, and three public members were to be elected by the Board at-large. The four ex-officio members were the chairmen of the three Assemblies, each of whom is elected by its respective Assembly, and the President of the Council.

Another of the concerns at that time, and one that still persists in certain quarters, is the extent to which the institutions and the chief executive officers are involved in taking responsibility for effective operation of the Council. All of the members of the Board, except the public members, must hold responsible positions in accredited higher education institutions. The kind of structure, however, goes further than this. It does provide in fact that at least two-fifths of the members of the Council will be chief executive or academic officers. The three elected by the National Higher Education Presidential Organizations are inevitably presidents, but, in addition to

this, the structure provides that on nomination by the Assemblies or by the institutions themselves, three members shall be chief executives or chief academic officers who are there not by virtue of their relation to a particular higher education organization, but by virtue of their institutional positions. This gives the Board an opportunity to balance itself in terms of types of institutional chief executive or academic officers, and thus provides the chief executive or academic officers the largest representation on the Board. This does not complete the picture, for usually one or two members elected by the Assembly of Institutional Accrediting Bodies are in fact presidents or chief executive academic officers as well. For practical purposes, this means that the institutions constitute a majority or close to a majority at any particular time.

Further, the adding of the third Assembly is extraordinarily important in this context. During the period of development of the other two Assemblies, the need for bringing together the leadership of the national higher education organizations involved in COPA and the institutional representatives of those organizations on the Board for discussions of common concern as these relate to accreditation in general and to specific accrediting agencies, led to the formation by the President of the American Council on Education, Dr. Jack Peltason, of what was called the Interassociation Presidents' Committee on Accreditation. This was a somewhat peculiar kind of organization which, in addition to including members of the COPA Board, included the executive officers of these associations in a structure that was really not within COPA, or at best was what might be described as half-in and half-out. This led to friction and some considerable misunderstanding at times in relation to what the role of Interassociation Presidents' Committee was and the extent to which it could in turn interpret the actions of the Council. It was a feeling of the Advisory Panel and of the COPA Board, as indicated by its final action, that this group should be within the structure of the Council, where not only it would have an opportunity to have impact on the development of policy by the Board but be able to exchange concerns and interests with the other two Assemblies directly.

Through this third Assembly, the institutions are not only represented by the institutional accrediting bodies to which they belong but by the national higher education organizations and by presidential members of those associations in the work of the Council. There was some effort at that time of the adoption of the current structure to strengthen even further the role of the Presidents by (1) providing that the chair of the Council shall always be a president, and (2) by increasing still further the presidential representation and leaving the responsibility for election of all presidential members to the Assembly of National Postsecondary Educational Organizations. In its wisdom the Board accepted the recommendations of the Advisory Panel out of belief that it provided considerably more balanced approach which did give a major role to college presidents, but did not destroy sufficient balance to prevent domination by any one organizational group.

Among other critical changes was the establishment of a separate Recognition Committee elected by the Board, but, with the exception of the chairman, not made up of Board members. Under the prior system, with the Recognition Committee made up of Board members, the Board had been in the interesting position of serving as judge and jury in the recognition process. Under the new structure, the Board retained responsibility for approval of recognition criteria, election of new members of the Recognition Committee and final actions on recommendation of the Committee. It relinquished, however, the specific hearing and review process which is the province of the Committee. The Executive Committee was reduced to five members including the chair, chair-elect/past chair, the treasurer, the chairman of the Recognition Committee and the President ex-officio.

By including the chairs of the Assemblies as ex officio members of the Board, the new structure tied together much more effectively the activities of the Assemblies and the Board and strengthened their relation to each other. This is the structure under which the Council is currently operating.

TABLE I

GOVERNANCE AND FINANCE
COPA's PREDECESSORS

National Commission on Accrediting (1973 reorganization)

Board: 33 Members

- 21 representing 7 national institutional higher education organizations: ACE, AASCU, AAC, AAU, AACJC, NASULGC, NAICU 3 appointed by each.
- 3 trustees appointed by AGB
- 3 elected by CSAA (specialized accrediting bodies)
- 3 representatives of FRACHE
- 3 public members

Finance (1974):

Revenues: $175,000
Average institutional assessment: $150 (1200 institutions)
Reserve: $120,000
No payment from specialized accrediting bodies into general fund

Federation of Regional Accrediting Commissions of Higher Education

Board: 26 Members

- 18 from six collegiate commissions
- 3 appointed by each commission
- 6 public members
- 1 NCA (elected president)
- 1 FRACHE, executive director

Finance (1974):

Revenue: $183,000
Based on $75 per institutional member
Note: Amount <u>not</u> assessed to institution as such but allocated from commission budgets (2350 institutions).
Reserve: $150,000

(Combined NCA - FRACHE budgets 1974: $358,100)

TABLE II

GOVERNANCE AND FINANCE
INITIAL COPA STRUCTURE 1975

Board: 36 Members

- 12 appointed by regional commissions
  2 from each of 6 regions
- 7 appointed by national higher education organizations in NCA: 1 from each
- 4 elected by CSAA
- 4 national institutional accrediting bodies: 1 each
- 9 public: 2 appointed by Education Commission to the States; 1 appointed by Office of Education Advisory Committee; 1 appointed by AGB; 5 elected at large

Differences from NCA-FRACHE

1. National associations lose 14 representatives (2 per association)
2. Regionals lose 6 (1 per association) but retain 1/3 of membership
3. CSAA (specialized bodies) gained 1 seat
4. National institutional accrediting bodies gain 4 seats
5. ECS, OE represented by 3 seats
   OE declined to make an appointment
6. AGB loses 2 seats

Executive Committee

Bylaws prescribed 7 members
Composition (by practice but not in bylaws):
2 regionals, 2 specialized, 1 proprietary,
1 national higher education organization,
1 public member

NOTE: All board members except public members were to be from accredited institutions of postsecondary education--(No staff members on board).

Finance:

First year operating budget: $259,000
Inherited reserve: $270,000
Initial dues plan:
Institutional accrediting bodies:
$60 per institution accredited (3400 institutions)

National higher education organizations: $1000 each
sustaining fee
Specialized accrediting bodies: $250 to $1250
based on number of accredited programs
Interest Income: approximately $1500

TABLE III

GOVERNANCE AND FINANCE
COPA 1978 REVISION

Board: 40 Members

12 appointed by 6 regional Commissions
1 regional staff person
7 appointed by national higher education organizations
4 appointed by national institutional accrediting bodies
1 national institutional staff member
9 elected by Assembly of Specialized Accrediting Bodies, including 1 staff member
4 public members elected by Board
2 unassigned positions

2 standing Committees: Recognition Committee to include institutional and specialized staff persons (1 each) as well as other Board members.
Finance

Assembly of Institutional Accrediting Bodies created
Assembly of Specialized Accrediting Bodies created
Executive Committee increased to 9 by adding chairs of Recognition and Finance Committee as ex officio members

Differences from initial structure:

1. Added 3 accrediting agency staff to Board
2. Increased specialized accreditation representation from 4 to 9
3. Decreased public members from 9 to 4
4. Added 2 standing committees: Recognition and Finance
5. Created 2 Assemblies: ASAB and AIAB
6. Added 2 ex officio members to executive committee
7. Election of specialized accrediting representatives to Board by ASAB rather than CSAA

Finance:

Fees:

$500 per institutional accrediting body sustaining fee
$300 per specialized accrediting body sustaining fee
Increased per institution assessment for institutional accrediting bodies to $65
Developed program assessment for specialized accrediting bodies of $7 per program not to exceed $2100

TABLE IV

GOVERNANCE AND FINANCE
ALTERNATE FINANCE PLANS - 1980-82

1. 1980 Plan

Board Financing Committee established in 1978.

Reported in 1980. Report adopted in principle by the Board but implementation delayed until after 1981 self-study.

"Parity Plan" based on assumption that approximately 1/2 of the funds spent on accreditation nation-wide are expended in relation to institutional accreditation and about 1/2 specialized accreditation.

45% dues income from institutional accrediting bodies
45% dues income from specialized accrediting bodies
10% dues income from national organizations

Committee suggested realignment of Board representation to correspond to dues structure.

Base for assessment: Millage based on association expenditures for accreditation. Annual expenditures of associations divided into proposed COPA budget. Thus, percentage levy indexed to changing expenditure base.

Plus sustaining fee: $2000 per accrediting agency
$5000 per national association

Plan to be phased in over 5 years. In the interim, specialized accrediting bodies to pay $20 per institution in which they have accredited programs.

Problems: Incompatibility of accounting procedures by agencies, even among institutional accrediting bodies. Peat, Marwick and Mitchell study: Millage approach theoretically possible but practically not feasible.

Incompatibility of financing practices among specialized accrediting bodies—including sources of income which frequently are not from institutions.

Unrealistic burden on limited number of specialized agencies.

Plan officially repealed in October, 1982 on recommendation of ad hoc finance committee created in 1981.

2. Self-Study Advisory Panel Plan

Direct Institutional support

Direct collection from institutions: 77%
Institutional assessment to be based on size from $50 per annum for institutions of 500 students or under to $600 for institutions of 10,000 students and above.

Institutional associations: 5% with flat fee of $2500

Accrediting Bodies: 18%

Uniform fee of $2500 except for 15 smallest bodies which would be assessed $1500.

Board accepted the principles behind the financing plan, but not the plan and referred the matter to a special ad hoc financing committee.

3. Final report of ad hoc finance committee October 1982

Recommended that the current plan for the system (then interim plan) be continued for the next 5 years.

Rejected direct institutional support on the basis of (1) University of Maryland "market survey" which showed lack of support for sanctions and questionable number of institutions willing to pay; (2) cost of billing and collections; (3) inability to forecast actual income; (4) without sanctions the plan would provide a free ride for non-paying institutions.

TABLE V

GOVERNANCE AND FINANCE
COPA 1982

Board: 19 members (15 elected, 4 ex officio)

- 3 elected by Assembly of Institutional Accrediting Bodies
- 3 elected by Assembly of Specialized Accrediting Bodies
- 3 elected by Assembly of National Postsecondary Educational Organizations
- 3 institutional chief executive or academic officers elected at large by the Board on nomination of assemblies
- 3 public members elected by the Board
- 4 ex officio members: chairs of Assemblies and President of COPA

3 Assemblies:

AIAB
ASAB
Assembly of National Postsecondary Educational Organizations:
7 national institutional organizations, plus AGB. 2 representatives of each: institutional member and organization staff executive.

Standing Committees:

Executive Committee: Chair, Chair Elect/Past Chair, Treasurer, Chair of Recognition Committee and President

Recognition Committee: Chair appointed from Board and 8 members elected by Board on nomination from the Assemblies: 2-AIAB, 2-ASAB, 2-ANPEO, 2-public

Committee on the Public Interest: Public members of Board and Recognition Committee

Differences from 1978 structure:

1. Board reduced from 40 to 19; 15 elected rather than appointed and 4 ex officio
2. Executive Committee reduced to 5 members and assigned role of finance committee
3. Separate elected recognition committee
4. Establishment of Assembly of National Postsecondary Educational Organizations by incorporation of the former interassociational President's Committee on Accreditation plus AGB within COPA
5. Established Committee on the Public Interest on standby basis

Finance: 1985-86

Basic dues distribution formula (adopted on recommendation of ad hoc finance committee in October 1982)

Institutional Accrediting Bodies: 60%
Specialized Accrediting Bodies: 30%
National Postsecondary Educational Organizations: 10%

Sustaining Fee: Institutional accrediting bodies: $1985.00
Specialized accrediting bodies: $1890.00
National Postsecondary Educational Organizations: $5844.00

Institutional accrediting bodies, fee per institution: $64.00
Specialized accrediting bodies, scale of payment per number of programs:

Number of Programs	Additional Fee	Total
0-50	$ 0.00	$1890.00
51-100	$1105.00	$2995.00
101-200	$2205.00	$4095.00
200+	$6065.00	$7955.00

General Fund Balance $342,444 (as of July 1, 1985)

The Board has accepted a 2% increase in dues for 1986-87.

CURRENT BUDGETS

The chart which follows (pages 2-3) compares the proposed income and expenditures for FY '87 to the income and expenditures for FY '86. While the operating budget has increased by approximately 10% per year since 1977, the income received from dues has increased by approximately 8% per year. The increase in dues income each year is a function of increases in numbers of institutions accredited, changes in scope and the recognition of new accrediting bodies and not a result of constant dues increases. The notes following the budget comparison (page 4) explain the variance between the two budgets.

The COPA Policy on Invested Funds and Use of Earnings on Interest From Investments (page 5) follows the notes on the budget. COPA began existence with reserves of $208,491. At the end of FY '85 they had increased to $342,444, or 64% of the operating budget. The COPA Policy on Reserves was written adhering to sound business principles with the understanding that in the light of unforeseen emergencies COPA could function for at least six months (50% of the operating budget).

The graph (pages 6-7) shows the COPA Reserves in relation to the Operating Budget and Dues Income from 1976 to the present.

COUNCIL ON POSTSECONDARY ACCREDITATION
Proposed Income and Expenditures for 1986-87
and Comparison to Budget for 1985-86

Revenue:	1985-86 Budget	1986-87 Proposed Budget
Restricted Fund Interest	1,000	1,000
Membership Dues	495,436	533,299[1]
Interest	30,000	37,000
Publications	2,500	3,500[2]
Subscriber Memberships	1,800	1,800
Miscellaneous	100	100
Pre-Application Process	2,000	2,000
Total Revenue....	$532,836	$578,629
Expenditures:		
Salaries (Permanent)	$270,770	$279,850[3]
Part-time Wages	1,000	1,000
Benefits	66,357	70,580[4]
Miscellaneous Personnel costs		9,000[5]
Meetings:		
Board	21,000	21,000
Executive Committee	3,000	5,000[6]
Task Force Meetings]		
Assembly Meetings]	13,000	15,000[7]
Other Board Committee Meetings]		
Committee on Recognition	12,000	14,000[8]
Program Development	2,000	2,000
Professional Development	4,000	5,000[9]
Regional Meetings	3,000	3,000
Travel:		
Staff	18,000	18,000
Publications:	20,000	30,000[10]

Equipment:		
Lease/Rental/Purchase	8,000	6,000[11]
Maintenance	2,000	6,000[12]
Office Expenses:		
Rent	43,082	48,642[13]
Telephone	6,000	7,000
Postage/Handling	8,500	9,500[14]
Duplicating	3,500	3,500
Supplies	6,000	6,000
Storage		1,200[15]
Professional Services:		
Accounting/Auditing	7,000	7,000
Legal	2,000	2,000
Insurance/Bonding	5,000	5,000
Other Expenses:		
Membership/Publications	3,000	4,000[16]
Petty Cash	600	600
Miscellaneous	2,000	2,500[17]
Contingency	1,000	1,000
Total Expenditures.....	$531,809	$583,372
Net of Income Over (Expenses)	$ 997	($ 4,743)

Notes on the 1986-87 Proposed Budget

Revenue:

1. Membership dues are based on a 2% dues increase. The original approved 5% increase has been reduced in the light of actual versus projected income related to numbers of institutions and programs approved.

2. Publication revenue is increased by 40% to reflect the growth of sales.

Expenditures:

3. Dr. W.J. MacLeod will be retiring in May 1986. Salaries expenditures reflect a 4% increase.

4. Percentage of staff benefits is expected to rise proportionally with salary. The entire COPA staff will participate in pension plan activities.

5. Miscellaneous personnel costs constitute a one time expenditure to cover equity adjustment in staff benefit funding.

6. A $2000 increase in Executive Committee meeting costs is estimated due to increased travel costs.

7. A 16% increase in Assembly meetings, Task Force meetings and other Board Committee meetings is anticipated because of increased travel costs and committee activities.

8. A 17% increase in Committee on Recognition meeting expenses is anticipated in the light of current expenditure rates.

9. A 25% increase is anticipated due to increased sophistication of professional development programs.

10. A 50% increase in publications is projected to meet expanded publication activities, public affairs functions, and the rising costs of paper and printing.

11. Reflects reallocation of maintenance funds and procurement of new mailing machine and scale.

12. Reflects actual maintenance contracts for office equipment.

13. Office space subleased to Princeton will be reclaimed and used by COPA. The rent increase is estimated for 1986-87 to be 4% based on a 3% increase in CPI, 6% increase in taxes, and an 8% increase in operating expenses.

14. A 12% increase in postage and handling is anticipated with an increase in the publications budget.

15. Storage area at One Dupont Circle and maintenance of archives.

16. A 33% increase is anticipated due to increased costs of memberships and publications.

17. A 25% increase in miscellaneous expenses is expected.

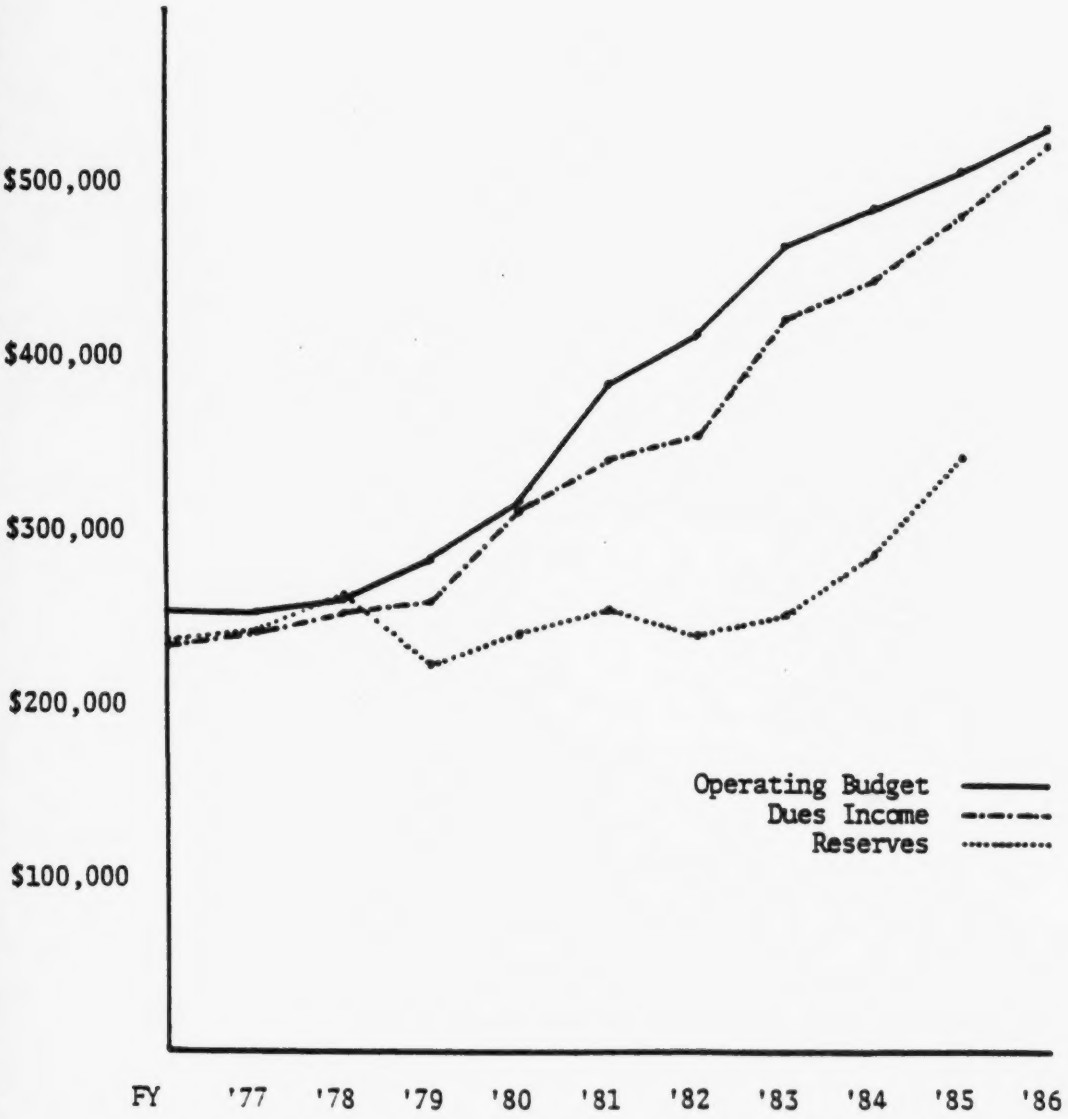
POLICY ON INVESTED FUNDS AND USE OF EARNINGS ON INTEREST FROM INVESTMENTS

It is the intention of the Council on Postsecondary Accreditation that its investment funds be placed in an appropriate mix of equities and fixed-income securities adequate to provide the additional income balance necessary. The policy of the Council on Postsecondary Accreditation is to secure a high percentage of interest income on funds invested generally to be used to augment its current operating budget.

It shall not be the policy to routinely accumulate such funds to increase the General Fund balance. It shall be the policy of the Council to maintain a General Fund balance equal to not less than 50%, nor more than 100% of the most recently completed fiscal year's operating budget. In order to maintain this policy, staff shall call it to the Executive Committee's attention any time the General Fund balance drops below 60% or exceeds 90% so the Executive Committee can consider whether budget modifications are indicated. The COPA staff and treasurer will periodically review the investment account and the reserve funds balance to determine performance and recommend whether changes in the investment policy by the Executive Committee are indicated.

COPA Operating Budget, Dues Income and Reserves

FY '77 - '86



COPA OPERATING BUDGET
DUES INCOME AND RESERVES

FY '77-86

FY	Operating Budget	Dues Income	Reserves
'77	252,800	242,430	243,127
'78	262,400	253,720	263,769
'79	286,500	260,690	224,347
'80	319,400	311,326	240,260
'81	386,000	340,338	255,056
'82	414,720	358,510	240,839
'83	465,884	422,476	262,793
'84	487,423	445,467	289,638
'85	508,244	481,894	342,444
'86	532,836	522,774*	Figures not Available

*Projected

60

POLICY DEVELOPMENT

Prior to 1981 the COPA Board had adopted a series of at least six major substantive policy statements. These included (1) a 1976 statement on accreditation and off campus operations (superseded by a revised 1983 statement), (2) the critically important "Joint Statement on Transfer and Award of Academic Credit" co-sponsored by COPA, ACE and AACRAO in 1978, (3) a joint statement on "Accreditation of Graduate Education" developed and issued in cooperation with the Council of Graduate Schools in the United States also in 1978, (4) "Accreditation and Eligibility" in 1980, (5) "Accreditation and the Public Interest" in 1980 and (6) "Guidelines on Interagency Cooperation" also in 1980.

In addition to these statements the Council had inherited a series of policy statements from the Federation of Regional Accrediting Commissions of Higher Education (FRACHE) pertaining primarily to institutional accreditation. They ranged all the way from "substantive change" to "study abroad." While they were never officially adopted as COPA policies, during the first five years they tended to serve a function analogous to case law. The corpus of COPA policies ranged from the bylaws and personnel policies to general substantive polices such as the six above. In the late 70's it became obvious that a general review on clarification of the policy structure would be desirable.

To clarify and, in fact, to codify the policies, the Board at its meeting in October of 1979 appointed an ad hoc Committee on Policy chaired by Dr. Thomas Ragle. The Committee was asked to review the policy on policies, current policies and relevant practices of predecessor organizations (FRACHE particularly), and develop recommendations in relation to policy formation, structure and classification.

The Committee reported in April of 1981. Essentially it recommended the following:

1. That the by-laws include a statement that "The Board shall adopt provisions for formulating policies and guidelines."

2. That the Board adopt a policy in relation to policy formation calling for utilization where appropriate of task forces and/or ad hoc committees appointed by the Executive Committee but that the draft policy statements should be reviewed by the COPA constituents before Board action.

3. That the FRACHE policy statements be temporarily included as an appendix to the policy book for review and decision as or if relevant for development as COPA policy in the future.

4. That policies be published in a book in loose leaf form under four policy headings:

a. Operational: Those policies, internal or external, which affect the way in which the Board, the Board Committees, the Assemblies and the staff are formed and/or conduct their business.

b. Testimonial: Those policies adopted by the Board as public position statements.

c. Interagency: Those guidelines that affect directly the interrelationship of member agencies in accrediting activities.

d. Agency: Those guidelines which affect or relate to how individual member agencies carry out their own mission or accredit their own members.

5. Finally, it recommended that a new ad hoc policy committee consisting of five members be appointed each year to carry out the work of review of existing policies, consider policies brought forward for adoption, and identify further areas for policy activity.

All five recommendations were adopted. The policy book was developed and is revised each year. The ad hoc policy committee for 1982 completed its work of review of the FRACHE polices and current COPA policies and recommended in October 1983 that the committee cease to exist and that its functions of reviewing policy before recommendations to the Board for adoption be taken over by the Executive Committee.

The general policy development guidelines have been followed since 1981. Policy issues may be identified by the various Assemblies, by the Board, by the Recognition Committee, or by the Executive Committee itself. If the Executive Committee determines that the issue is of sufficient importance to warrant developing a policy statement, on approval by the Board an ad hoc committee or task force is appointed and charged to carry the investigation further and develop a draft policy statement as necesary or desirable for consideration by the Assemblies and the Board. The draft statement is then placed on the agenda of each Assembly where it is reviewed, discussed and suggested changes developed. Usually, after further revision by the Committee or task force it is again reviewed by the Assemblies and referred to the Board for action. In the case of more complex issues (e.g. Disclosure and Confidentiality) the process may take up to three years to complete.

Since 1981, eleven major policy statements have been developed and adopted. This does not include personnel or investment policies that are purely operational in character. Of these eleven one is operational, six are testimonial and four are agency guidelines. While in general the agency guidelines policy statements are most directly related to the recognition provisions, in some cases, e.g., the "Rights and Responsibilities of Accrediting Bodies and Institutions in the Accrediting Process," the division is somewhat arbitrary. The classification, however, at least provides general guidance as to intent and utilization.

Of the eleven policy statements nine have been developed through the ad hoc committee task force route. Three grew directly out of individual Assembly concerns and with modifications by the other two Assemblies went directly to the Board ("The Role and Value of Accreditation," "Trustee Involvement in the Accreditation Process," and "Considerations When Closing a Postsecondary Educational Institution"). One resulted from a major externally funded study ("Accreditation and Authorization of Distance Learning Through Telecommunications").

The eleven adopted since 1981 are the following:

Classification of Accrediting Bodies 1982
The Role and Value of Accreditation 1982
Considerations When Closing a Postsecondary Education Institution 1982
Principles of Good Practice in Institutional Advertising, Student Recruitment and Representation of Accredited Status 1983
Off-Campus Credit Programs 1983
Evaluation of Accrediting Activity by Institutions 1983
Disclosure, Confidentiality and the Integrity of the Accrediting Process 1984
Trustee Involvement in the Accreditation Process 1984
Accreditation and Authorization of Distance Learning Through Telecommunications 1984
Rights and Responsibilities of Accrediting Bodies and Institutions in the Accrediting Process 1985
Validity and Reliability of Accrediting Standards 1986

Two additional policy ad hoc committees are currently at work, one on Accreditation of Foreign Institutions, and one under the aegis of the Recognition Committee, with the endorsement of the Board, on Revision of Recognition Criteria. Each has made one progress report (October 1986 meetings in New Orleans) and is expected to report again in April 1987 in Chicago. In one area, Jurisdiction and Accrediting Practices in Relation to Freestanding Single Purpose Institutions, an ad hoc committee exists but has been placed on a standby basis to deal with ad hoc problems in this area as they arise.

ATTACHMENT--POLICY DEVELOPMENT

COPA Board-appointed committees for policy development (1981-1986)

The Role and Value of Accreditation (1982)

Paper on "The Role and Value of Specialized Accreditation" developed by ASAB. Decision made to enlarge consideration to include institutional accreditation. Thurston Manning developed paper, with MacLeod as staff. Adopted by Board in October, 1982.

Considerations When Closing a Postsecondary Institution (1982)

Approved in principle by the Regional Commission Executive Officers in September, 1980; revised in February, 1982 for further consideration by the COPA AIAB and Ad Hoc Policy Committee. Adopted in October, 1982.

Classification of Accrediting Bodies (1982)

Ad Hoc Committee: Mary Louise Petersen, Chair; Robert Kirkwood; Samuel Hope.

Principles of Good Practice in Institutional Advertising, Student Recruitment, and Representation of Accredited Status. (1983)

Paper developed by James Bemis; refined by Ad Hoc Policy Committee: Bruce Dearing, Chair; Robert Ewigleben; Jack Peltason; Norman Watson.

Off-Campus Credit Programs (1983)

Ad Hoc Commmittee: Howard Steed, Chairman; Grover Andrews; James Bemis; James Hayes.

Evaluation of Accrediting Activities by Institutions (1983)

Ad Hoc Committee: Mary Louise Petersen, Chair; John Fauser; Richard Gilman; Gordon Sweet; Elinor Yungmeyer.

Disclosure, Confidentiality and the Integrity of the Accrediting Process (1984)

Ad Hoc Committee: Janet Hay, Chair; Billie Ackerman; Robert O'Neil; Lawrence Pettit; James Phillips; Patsy Thrash.

Trustee Involvement in the Accreditation Process (1984)

Document developed by Bud Silverman and approved as a resolution by AGB. Revised by Assemblies; approved by COPA Board in October, 1984.

Accreditation and Authorization of Distance Learning Through Telecommunication (1984)

Joint COPA/SHEEO Steering Committee, co-chaired by Richard Millard and Gordon Davies. COPA representatives: Kay Andersen; William A. Fowler; Robert Kirkwood; Thurston Manning; David Reyes-Guerra. SHEEO representatives: William Fuller; Norma Glasgow; Edward Moulton; T. K. Olson; Harry Snyder.

Rights and Responsibilities of Accrediting Bodies and Institutions in the Accrediting Process (1985)

Ad Hoc Committee: Bruce Dearing, Chairman; Sidney Berengarten; Richard Gilman; Ben Hudson; Mario Santangelo; James Bemis; Lattie Coor; Norman Watson; Frances Horvath; Lee Kerschner.

Validity and Reliability of Accrediting Body Standards and Process (1986)

Ad Hoc Committee: Richard Weeks, Chairman; Samuel Hope; Thurston Manning; Samuel Taylor; Robert Swenson.

Jurisdiction and Accrediting Practices in relation to Free-Standing, Single-Purpose Institutions

Ad Hoc Committee: Rhodes Haverty, Chairman; Kay Andersen; William Kalkhof; Thurston Manning; Samuel Taylor; Douglas Ward.

(Currently inactive; remains on stand-by basis to deal with specific issues as necessary.)

Committee on Accreditation of Foreign Institutions or Programs

Ad Hoc Committee: William Baumgaertner, Chairman; Kay Andersen; Helen Grove; Milton Blood; Linda Stamato.

(Currently in progress)

* * * * *

Other active COPA Board-appointed committees:

Committee on Professional Development

James Phillips, Chairman; Billie Ackerman; Nancy Axelrod; Paul Nelson; Nancy Roadcap; Minna Weinstein.

Editorial Committee for "Educational Quality and Accreditation"

John Fauser; Robert Glidden; Lucille Maurer; Thurston Manning; Robert O'Neil.

COPA/ABA Liaison Committee:

COPA representatives: Ellis McCune; Robert O'Neil; Mary Louise Petersen; James Olson; President Richard Millard. ABA representatives: Robert McKay; Samuel Roberts; Gordon Schaber; James White.

COPA/SHEEO Liaison Committee

COPA representatives: Rhodes Haverty; Robert Kirkwood; Richard Kunkel; Thurston Manning; James Phillips; James Rogers; Douglas Ward; President Millard. SHEEO representatives: Robert Bersi; John Corrozi; Gordon Davies; Gordon Foster; T. Edward Hollander; Sheldon Knorr; James Mingle.

* * * * *

Committee on Recognition Subcommittees

Committee on Revision of COPA Provisions

Ad Hoc Committee apponted by the Chair of the Committee on Recognition. Recommendations will go to the full Committee for its consideration and action before going to Assemblies and Board. Because of the significance of its charge, the committee's membership includes representation from COPA's broader constituencies.

Thurston Manning, Chair; Charles Cook; Jerry Flora; Samuel Hope; Henry Spille; Betsy Ranslow.

Committee on Pre-Applicant Process

Ad Hoc Committee appointed by the Chair of the Committee on Recognition. Recommendations will go to the full Committee for its consideration and action before going to Assemblies and Board. Currently inactive pending development of recommendations from the Committee on Revision of COPA Provisions.

Thurston Manning, Chair; Louis Heilbron.

COMMITTEE ON RECOGNITION

The Self-Study Advisory Panel report of September 23, 1981 recommended major changes in the recognition process:

> The recognition process is central to COPA's function. Currently the entire process is carried out by the Board. The members of the Recognition Committee are with some exceptions Board members. Board members serve on the review panels and final action is taken by the Board on recommendations from the Recognition Committee. This not only places considerable additional responsibility and time requirements on the Board members but, more fundamentally, it makes the Board in effect both judge and jury. To increase the effectiveness and integrity of the process yet retain final authority for recognition with the Board, the Recognition Committee, with the exception of its chairman, should not be Board members. It is in the recognition process that the experience of staff members of accrediting associations would be of particular value. Thus provision should be made for limited staff membership. Otherwise the Recognition Committee, like the Board, should reflect the constituents of accreditation, including the public. Both the final authority for recognition on recommendation of the Committee and the responsibility for initiating changes and improving policies and procedures should rest with the Board.

The Advisory Panel recommended that the Recognition Committee should consist of the Chairman, who should be a member of the Board and elected by the Board, plus eight members chosen so as to ensure representation of each Assembly and the public. This recommendation was accepted and incorporated in the COPA Bylaws, Article VIII, Section 8:01. Each of the following groups are represented by two members of the Committee:

1. The Assembly of Institutional Accrediting Bodies.

2. The Assembly of Specialized Accrediting Bodies.

3. The Assembly of National Postsecondary Educational Organizations.

4. The Public.

Each Assembly recommends at least two people to the Nominating Committee of the Board for membership; public members may be recommended by the Assemblies, by Board members, or by other interested organizations. All members are elected by the Board.

Duties of the Committee on Recognition:

Under policies and procedures established by the Board, the Committee on Recognition reviews applications of organizations proposing to engage in accreditation of postsecondary institutions or educational programs, examines relevant information, conducts hearings, and consults and informs persons about such applications. It evaluates at least every five years the

performance of recognized accrediting bodies and develops recommendations concerning the continuance of recognition. It further advises the Board on matters of criteria and procedure in connection with the recognition process.

The Committee is also responsible for recommending any changes in the recognition procedures, approving review schedules, appointing adjunct members of the Committee and reader-consultants for the process, and making recommendations for more effective interagency cooperation in accreditation.

Committee on Recognition record (1982 ff.)

Appointments to the new Committee on Recognition were made in April, 1982, and the Committee began work in July, 1982 on developing procedures and policies essential for its expanded responsibilities. Since its first meeting in October, 1982, the Committee has met twice each year at the COPA semiannual meetings, usually from Sunday to Tuesday. Executive sessions are held on Sunday and Tuesday, and recognition review hearings are conducted on Monday.

The record of the Committee from July 1, 1982 to April, 1986 includes the following:

1. Recognition reviews:

   The Committee has conducted 42 hearings for 41 accrediting bodies. Two of these were for initial recognition.

   Recognized accrediting bodies must be reviewed at least once every five years. Notice of scheduled reviews is published in national publications. Six months before the hearing the accrediting body submits an application for recognition which includes an account of the organization's compliance with each provision for recognition as well as essential supporting documents. Each application is reviewed in depth by an appointed reader-consultant and two members of the Committee on Recognition designated as reviewers. In addition, a visit may be required to observe an on-site visit and a meeting of the accrediting commission.

   The procedures observed for the hearings and the possible recommendations of the Committee are detailed in the Provisions and Procedures, pages 11 to 16.

2. COPA-recognized accrediting bodies:

   In October, 1982, COPA had recognized 39 specialized accrediting bodies and 13 institutional accrediting bodies, a total of 52. As of April, 1986, COPA recognizes 36 specialized accrediting bodies and 14 institutional accrediting bodies, a total of 50. During this period, two new accrediting bodies have been added, four have been dropped or have withdrawn, and one specialized body has become a member of the institutional Assembly.

3. Pre-applicants:

Accrediting bodies desiring to apply to COPA for initial recognition must complete a pre-application process prior to making any formal application for COPA recognition. The process is an informal one and does not imply any recognition classification, status, or relationship with COPA. It is a process of inquiry and consultation, whose basic purpose is to determine whether an accrediting body should be encouraged to apply for recognition. Materials submitted by organizations are reviewed by the Committee at regular executive sessions.

Eight organizations have entered this process. Two of these completed the process and subsequently were reviewed for recognition and granted recognition. Three others have completed the process and are scheduled for recognition review next year. The others are not active at this time and have not received encouragement to apply for recognition.

4. Handbook for the Committee on Recognition:

The Committee and COPA staff have had to spend significant time in developing procedures and policies that would make the recognition process more effective, professional, and rigorous. By mid-1983 the first Committee on Recognition Handbook was available to all members of the Committee. The latest revision (1985) is an 85-page manual with four sections: (1) materials relevant to the recognition review process, including recognition provisions and procedures, guidelines for reader-consultants and visitors to accrediting bodies, procedures for the Committee relative to recognition actions, and responsibilities of designated reviewers and Committee members; (2) interim report reviews; (3) pre-applicant reviews; and (4) COPA policies relevant to the recognition provisions and purposes. (See attached "Table of Contents" for the Handbook)

5. Manual for acrediting bodies:

Accrediting bodies scheduled for review from October, 1986 on will receive a bound "Guide to the COPA Recognition Review Process", providing information on preparing for the review, the COPA provisions and procedures, essential procedural information, the guidelines for reader-consultants and for visits, and COPA policies relevant to the recognition process. (See attached "Table of Contents" for the Guide)

6. Committee proposals for revisions in the recognition process:

Since the Committee was formed, all guidelines, procedural documents and policy-statements have been submitted to the Assemblies for their review and analysis prior to requesting

Board approval. In addition, as the Committee has had increased experience with the provisions and the responses to these by accrediting bodies seeking initial or continued recognition, and with the pre-applicant process, some significant questions have surfaced. Two committees were therefore formed to address these issues, one on the pre-applicant process and one on the COPA provisions for recognition.

The Pre-Applicant Process:

A sub-committee of the Committee on Recognition agrees that there are serious flaws in the pre-applicant process. Although it has helped to weed out accrediting bodies that cannot expect to meet COPA provisions, and has helped some of the organizations to improve their accrediting activities, there are fundamental weaknesses. The purpose of the process remains unclear. Its emphasis on demonstration of need founders on the ambiguity of "need". The process puts the Committee in a difficult (even impossible) position by involving it in providing extensive consultative help over an extended period of time, and then expecting it to make an objective decision about initial recognition.

The sub-committee is now developing its analyses and recommendations for the full Committee. Any recommendations for changes in the process will be presented to the Assemblies prior to requesting action by the Board.

Revision of Provisions:

The COPA provisions for recognition are in effect the criteria in terms of which accrediting bodies are reviewed for recognition. The current provisions represent revisions adopted in April, 1981, and became effective for all accrediting bodies reviewed from April, 1982 on. As of April, 1986, 48 accrediting bodies will have been reviewed against these provisions. Only one revision has been proposed by the Committee and adopted by the Board during the last five years, the addition to provision C.5. (which stipulates that an accrediting body must require a self-analysis of the institution or program and an on-site review by a visiting team) of the phrase "or a validated equivalent of an on-site review".

The Committee has, as a result of its reviews of the 48 accrediting bodies, developed some sense of instances where provisions appear to need revision to ensure clarity. In addition, it has just been provided by the Committee on Validity and Reliability the analysis of the COPA provisions and some recommendations for change developed by that committee. Consequently, a Committee on the Revision of COPA Provisions was appointed in December, 1985, whose charge is to identify and consider possible revisions of the COPA provisions to ensure that the objectives of the recognition process are better realized, and develop a final report for the Committee on Recognition with recommendations concerning any revisions.

THE COPA ASSEMBLIES

In its report to the COPA Board of September 23, 1981, the Self Study Advisory Panel noted that the original COPA governance structure established in 1975 made no provision for forums for discussion, sharing of information, and policy development. The Federation of Regional Accrediting Commissions of Higher Education (FRACHE) had been dissolved, as had the National Commission on Accrediting (NCA), when both merged to form COPA, and, although regional commissions had representation on the COPA Board, the directors had to meet ad hoc for discussion of common concerns. The specialized accrediting bodies in 1973, two years before COPA was formed, had created the Council on Specialized Accrediting Bodies (CSAA) to represent their interests, since they had no representation on the NCA. They did not dissolve the CSAA after COPA was formed, and it provided the forum the COPA structure lacked. Regular meetings were held, usually in connection with COPA meetings. The creation by the COPA Board in 1978 of two Assemblies--the Assembly of Institutional Accrediting Bodies (AIAB) and the Assembly of Specialized Accrediting Bodies (ASAB)--partially filled the vacuum in the COPA structure. It was not, however, until 1984 that the specialized agencies concluded that their interests were being adequately met by the COPA Board and Assembly structure and voted to dissolve the CSAA.

The 1978 reorganization, however, provided no such forum for another constituent group, the national postsecondary educational organizations. The American Council on Education, the American Association of Community and Junior Colleges, the American Association of State Colleges and Universities, the Association of American Colleges, the Association of American Universities, and the National Association of State Universities and Land Grant Colleges each had one representative on the COPA Board, but, lacking an Assembly comparable to the two accrediting Assemblies, had formed an interassociation Presidents' Committee on Accreditation outside of the COPA structure to focus on areas in accreditation of particular concern to institutions. This committee met ad hoc once or twice a year until the COPA Board in 1981 incorporated, on recommendation of the Advisory Panel, a third Assembly--the Assembly of National Postsecondary Educational Organizations.

Assembly membership:

The Assembly of Institutional Accrediting Bodies (AIAB) now includes fourteen (14) accrediting bodies which evaluate institutions as a whole. There are nine regional postsecondary accrediting commissions from the six regions, and five national bodies that accredit specialized institutions--the American Association of Bible Colleges, the Association of Independent Colleges and Schools (private business schools and colleges), the National Association of Trade and Technical Schools (private), the National Home Study Council (home study institutions), and the Association of Theological Schools.

The Assembly of Specialized Accrediting Bodies (ASAB) includes thirty-six (36) accrediting bodies whose accrediting activities focus on educational units or programs within institutions, although some of the specialized bodies also evaluate

free-standing professional or occupational schools. Specialized accrediting bodies must accredit at the entry level(s) into the profession or occupation, and may also accredit higher level professional programs if they can demonstrate that such programs are directly related to the practice of the profession or occupation and that there is a need for such accreditation to protect the public.

The Assembly of National Postsecondary Educational Organizations (ANPEO) includes the seven (7) major presidential higher education organizations which, although not accrediting bodies, participate in the governance of COPA as representatives of the national postsecondary education community, plus the Association of Governing Boards.

Assembly powers and meetings:

Each Assembly has the power to elect members to the Board, report to the Board, and place matters on the Board agenda; to meet as an Assembly and meet with other Assemblies in the Combined Assembly; to develop its own agenda and adopt rules of order to govern its meetings; and to nominate at least two representatives to the Committee on Recognition. The Assemblies meet twice a year in conjunction with the semiannual meetings of the Board in the fall and spring. They meet separately as Assemblies and concurrently as the Combined Assembly.

The Chairman of each Assembly serves as an ex officio member of the Board of the Council. Each Assembly reports to the Board at each of its semiannual meetings, and each Chairman reports to the respective Assembly at each of the Assembly's semiannual meetings.

Issues on Assembly agendas: (October, 1982 fff.)

The pattern of meetings, i.e., meeting separately as Assemblies and meeting concurrently in the Combined Assembly, has provided an opportunity for each Assembly to develop its own agenda for discussion and action and to share its concerns with other Assemblies. Analysis of agendas for the four years since the third Assembly (ANPEO) was added indicates that shared items occupy the major part of each Assembly's agenda. There have been other issues that appeared on only one Assembly agenda that might have been thought of as peculiarly a concern of that Assembly alone. Many of these, however, when shared in the Combined Assembly, evoked interest and concern among members of other Assemblies. Typical of these were the AIAB's discussions of contractual relationships with unaccredited institutions, credit for experiential learning, statements of institutional integrity; the ASAB's concern about accreditation of free-standing single-purpose institutions; ANPEO's concern about recognition ties between COPA and the Department of Education, intercollegiate athletics, and the issue of certifying basic academic competencies.

Common concerns about issues have, however, dominated the Assembly agendas, and, in contrast to earlier years of COPA's existence when the common concerns

seemed to be centered almost entirely on issues of finance, representation, and operational matters, the shared concerns and efforts for the last four years have been on substantive issues related to COPA's objectives and purposes. The Assemblies reviewed thirteen documents developed by the Committee on Recognition in support of that Committee's efforts to make the recognition process professional, rigorous, and significantly helpful to all applicants in improving accreditation practices. These documents included guidelines for the conduct of reviews, for reader-consultants, for visitors to accrediting bodies, and for designated reviewers of applications and of interim reports, as well as policies and procedures for handling complaints registered against member accrediting bodies, for reviewing materials submitted in the pre-applicant process, and for reviewing proposals for change of scope.

Assembly role in developing COPA policy statements

As a result of concern about issues expressed in one or more Assemblies, ten policy statements have been developed by task forces appointed by the COPA Board. Each Assembly has then reviewed the progress reports and final reports of these task forces in its own meetings and in the forum provided by the Combined Assembly prior to consideration and adoption by the Board. Seven of these policy statements have been printed as COPA brochures:

The Role and Value of Accreditation
Principles of Good Practice in Institutional Advertising, Student Recruitment, and Representation of Accredited Status
Considerations When Closing a Postsecondary Educational Institution
Off-Campus Credit Programs
Disclosure, Confidentiality, and the Integrity of the Accrediting Process
Rights and Responsibilities of Accrediting Bodies and Institutions in the Accrediting Process
Accreditation and Authorization of Distance Learning Through Telecommunications

Three others are available in printed form:

Classification of Accrediting Bodies
Trustee Involvement in the Accreditation Process
Evaluation of Accrediting Activities by Institutions

Another major task force has completed a three-year study on "Assessing the Validity and Reliability of Accrediting Body Standards and Process". Its report was accepted by the Assemblies and the COPA Board in October. A policy statement on this subject will be considered by the Board at its meeting in April, 1986.

Relationships with other organizations

In addition to providing a forum for discussion of issues, sharing of common concerns, and action on policies and procedures to strengthen the

accreditation process and help in the realization of other COPA purposes and objectives, the Assembly structure has provided a forum for meetings with individuals and groups with specific interests in the quality of certain aspects of institutional life in postsecondary education. These have included representatives of the National Association for Foreign Student Affairs with concerns about study abroad programs and treatment of foreign students in the U.S.; a task force sponsored by the Association of Governing Boards concerned about the role trustees should play in institutional governance and evaluation of quality; representatives of the Council for the Advancement of Standards for Student Services/Development Programs; the President of the Council for the Advancement and Support of Education concerning the need for assessment and enhancement of quality in institutional advancement and development programs; scholarly researchers studying various aspects of quality-determination in the accreditation process.

The Combined Assembly

The three Assemblies have met in the Combined Assembly at each semiannual meeting since October, 1982. Initially, there were two meetings of the Combined Assembly, one at the beginning of Assembly meetings used for the presentation of issues that each Assembly would be considering in its separate session, and a second to which members of the COPA Board were invited. Since the meeting at the beginning neither allowed nor encouraged much discussion, the meeting of the Combined Assembly was then scheduled as the final meeting of the Assemblies. This pattern does bring together members of the Assemblies and the Board, and has permitted the exchange of information by Assembly chairmen about the judgments and actions of the three Assemblies on common issues and about concerns specific to a given Assembly. It has not, however, encouraged significant discussion on any issues by Assembly or Board members. The Assembly officers and COPA staff are still attempting to devise a pattern for a Combined Assembly meeting that will permit and encourage significant discussion by Assembly and Board members of important concerns, without adding unduly to the time members must contribute to the semiannual meetings.

PROFESSIONAL DEVELOPMENT

Until the Spring of 1984, professional development activities were administered and funded by the Council of Specialized Accrediting Associations (CSAA), an organization of recognized and non-recognized specialized accrediting bodies which had its start during the period when the National Commission on Accrediting (NCA) was active (see earlier history of COPA). Indeed, since the creation of COPA in 1975 to 1984, the CSAA's purpose evolved almost exclusively into sponsoring professional development activities. Therefore, in 1983, the members of CSAA voted to dissolve as of December 1984 with the stipulation that their fiscal resources (approximately $15,000) be transferred to COPA for the expressed purpose of supporting professional development programs (for the COPA membership as a whole).

At its April, 1984 meeting, the Board appointed a "continuing" (as opposed to "standing" or "ad hoc") Professional Development Committee composed of six members on rotating terms: two representing ASAB, two representing AIAB and one representing ANPEO. The Vice Chairs of AIAB and ASAB are standing members and rotate the chairmanship annually.

The newly formed Committee defined its goals and objectives as follow:

Goals

To facilitate, with the COPA staff, the planning, implementation and evaluation of professional development activities for accrediting agencies and related organizations.

Objectives

1. To increase an understanding of issues related to accreditation.
2. To inform staff of changing conditions affecting accreditation.
3. To improve interaction and sharing of information.
4. To facilitate an increased effectiveness in staff operations and agency procedures.
5. To develop a continuity of programs to achieve these ends.

The operating budget of the Committee includes a combination of annual interest from the CSAA contribution (approximately $1350 annually), approximately $1200 in fees assessed non-members attending the programs, plus COPA funds designated for development purposes (approximately $7500 in FY'86 and $8500 in FY'87.

The activities of the Committee have taken two forms since its first program in October, 1984: programs held in conjunction with the semiannual meetings of the COPA Assemblies and Board and regional meetings held midwinter in Washington, DC and Chicago, Illinois. The following represent brief descriptions of the programs to date:

Semiannual Professional Development Programs

October 9, 1984 "A Seminar: The Appeals Process" St. Louis

The primary purpose of the seminar was to provide a forum for expert presentation and peer discussion on the legal bases and procedural considerations of sound appeals process.
(Note: This was the only half day program; the remainder represent full day programs.)

April 16 and 17, 1985 "The Evaluators: Selection, Training and Evaluation" Philadelphia

An indepth look at peer evaluation was given through the presentation and discussion of the selection, training and evaluation practices of a wide variety of accrediting bodies. Augmenting this two half day program was a resource handbook reflecting the current practices of 50 accrediting bodies in these areas.

October 9, 1985 "The Self Study: A Tool for Planning" Denver

This session was designed to provide the accrediting community the opportunity to share perceptions and practices concerning the use of the self study as an evaluation and planning tool.

The morning session, keynoted by Harold L. (Bud) Hodgkinson, Senior Fellow at the Institute for Education Leadership, centered on the need for planning in higher education and the role of accreditation in the planning process. The afternoon entailed a series of workshops dealing with specific practices of accrediting bodies. Augmenting the sessions were written materials, including Dr. Hodgkinson's recently published book, All One System: A Demographic Study of Kindergarten Through Graduate School.

April 16, 1986 "Accreditation and the States: Responsibility for Quality Education" New Orleans

States are assuming a more visible role in debates about quality in higher education, as evidenced by recent activities of the State Higher Education Executive Officers, the Education Commission of the States, and the National Governor's Conference. Many of the States' concerns, including credentialing, authorizing, licensing, testing and planning, are shared by the accrediting community. As understanding State activities in relation to the maintenance and enhancement of quality is critical to the nongovernmental accrediting community, the COPA Professional Development Committee selected this topic for the April 16 session in New Orleans.

Regional Meetings

The regional meetings were held in Chicago on January 28 and in Washington on January 31, 1986. The attendance at each exceeded 40, representing all but a half a dozen of the accrediting bodies. The focus of the program was a presentation on and discussion about the report of the Ad Hoc Committee on the Validity and Reliability of Accrediting Standards, facilitated by William J. MacLeod of the COPA Staff, Thurston E. Manning of North Central and Samuel Hope of the Associations of Schools of Music and Art and Design.

The information portion of the meetings, for the purpose of informal sharing among the accrediting staff members, generated a large number of areas which COPA in general and the Professional Development Committee specifically may consider for future programming.

It is currently the plan of the Professional Development Committee to continue sponsoring regional meetings, most probably on an annual basis, if it is determined that there is a theme compelling enough to merit the gathering of the membership.

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The Professional Development Committee meets twice a year to plan its schedule and program.

PUBLICATIONS

The work of the Council on Postsecondary Accreditation includes a publications program designed to support the Council's objective of service to accrediting bodies, postsecondary educational institutions and the public. The program also contributes to fulfillment of the Council's responsibilities to provide "national leadership and understanding in speaking for postsecondary accreditation."

Primary Public Information Activities

Accreditation--quarterly newsletter
- addresses accreditation issues of interest to the higher education community at large
- sent to chief executive officers of all accredited institutions and to representatives of national and state educational organizations, as well as to members of the accrediting community
- items reported include progress and results of major studies, news of COPA's Assembly and Board meetings, official public notices of accrediting body reviews, and comments from the President

President's Bulletin--newsletter for members
- published eight times yearly for COPA's immediate constituency--i.e., Assembly and Board members and other individuals directly involved in the work of the Council
- purpose is to keep members current on such items as the work of COPA's committees, meeting schedules, activities of member accrediting bodies, developments at the state and federal level, and announcements of job openings

The Balance Wheel for Accreditation--annual directory
- contains an introduction to accreditation and to the role of the Council, as well as listings of all member accrediting bodies and publications available from COPA
- distributed to institutions of higher education, to other interested groups, and to the Council's immediate community; used throughout the year as a general information piece in response to public inquiries

Guide to COPA Recognized Accrediting Associations--biennial factbook of basic information about members
- describes the organization, recognition classification, procedures, and fees of each recognized accrediting body
- distributed to members and listed as a regular COPA publication for use by other interested parties

Annual Survey--additional data from members
- accrediting bodies are asked to provide information such as nature and number of accrediting actions, names of Commission members, particular issues being considered, and changes in publications
- compiled and kept on file for reference in the COPA office

Research Projects--the following is a sample of publications prepared and distributed by the publications office during the last five years:

- The Role of Accreditation in Directly Improving Educational Quality, by Steven Jung (1986)
- Educational Quality and Accreditation: A Call for Diversity, Continuity and Innovation (1986)
- Assessing Long Distance Learning Via Telecommunications, by Bruce N. Chaloux (1985)
- Bibliography on Postsecondary Accreditation, by M.T. Neal and H.R. Kells (1984)
- Toward Academic Quality Off-Campus: Monitoring Requirements of Institutional Accrediting Bodies and the States for Off-Campus, Military Base, and Study Abroad Programs (1984)
- The Accreditors, by H.R. Kells (1983)

Subscriber Program
- serves the needs of nonmember organizations and interested persons who wish to receive news and publications released by the Council
- subscribers remit an annual fee covering the cost of receiving all releases from the publications program

Miscellaneous documents--assembly, printing and distribution of various COPA documents, including: Board Books for semiannual meetings, policy brochures, handbooks describing provisions and procedures for recognition, and policies and procedures manuals

NOTE: One final publication should be noted in discussing the Council's public information function. The annual guide to Accredited Institutions of Postsecondary Education is published for COPA by the American Council on Education (ACE). Information included in this volume about specific institutions and programs is provided by COPA's member accrediting bodies; COPA supplies explanatory material and a list of recognized bodies. However, members of the ACE staff edit the volume and coordinate its printing and sales. At its most recent meeting, the COPA Board asked the staff to investigate the possibility of transferring responsibility for this publication to the COPA office.

Recent Modifications in Publications Program

Over the last two years, the leadership of the COPA staff has placed increasing emphasis on the importance of the Council's publications and public affairs activities as a means of disseminating information to the higher education community and the general public. A number of program modifications have been undertaken as a part of this effort. These include the following:

Redesign of Regular Publications--newsletters, annual directory, provisions and procedures document, and research reports
- goal is to present an updated, unified, and recognizable image for institutional representatives and others inside and out of the higher education community
- changes include reorganized formats and new designs, with an eye to professional presentation

Increasing Public Affairs Efforts

- have initiated use of press releases concerning publications, events and activities, and have developed updated, computerized mailing lists for use in public information activities
- have had significant increase in publication requests, partially reflected in a doubling of publications revenue over the last year
- recent example of public information efforts is "Educational Quality and Accreditation" report. Approximately 2,700 copies of the report have been distributed to date. Articles concerning the report have appeared in the Chronicle of Higher Education and in journals of several higher education organizations. Requests for copies of the document have been received from institutions ranging from Michigan State University to Blue Mountain Community College in Oregon, from organizations as diverse as the AFL-CIO and the Army Education Division in Europe.
- have also provided materials for distribution by member accrediting bodies. For example, over 10,000 copies of a COPA policy statement concerning "Rights and Responsibilities of Accrediting Bodies and Institutions in the Accrediting Process" were sent out by member accrediting bodies to their institutions, Commission members, and other communities.

Suggested Directions for the Future

The publications program at COPA plays a significant role in providing information services to members of the accrediting community. It seems equally important, during a time when increasing public attention is focused on quality assurance in education, that the Council place priority on getting information out to those not as familiar with the role of accreditation in assuring and enhancing educational quality.

Possible future activities for an increasingly active public affairs function might include: the development of a general brochure about accreditation for the public or new educators, the initiation of a media campaign to reach the public with information about accreditation, and the production of print or audiovisual training materials for those in the field conducting site visits.

FUNDED PROJECTS

Preface

Since 1982, COPA has sponsored or cosponsored three major projects funded by external sources. For all three projects, primary staff work was provided by consultants (i.e., long term as opposed to ad hoc) and the organization of the first two projects below involved a project steering committee, aided by the work of task forces. Reports emanating from each of these projects are expansive and available for review. The following descriptions constitute project highlights.

PROJECT ALLTEL - ASSESSING LONG DISTANCE LEARNING VIA TELECOMMUNICATIONS

Sponsors: COPA and State Higher Education Executive Officers (SHEEO)
Duration: 2 years (1982-84)
Funding Sources:
a. Fund for the Improvement of Postsecondary Education ($229,704) for general Project activities
b. Annenberg/CPB Project ($10,000) to support a national teleconference to disseminate the results of the Project in May, 1984

Primary Purpose:

To focus on the rapid development and use of telecommunications to deliver postsecondary education and the need to ensure the quality and integrity of this instructional activity from the perspectives of the accreditation and State communities.

Results of Project:

- A national video teleconference May 31, 1984, telecast via the Public Broadcasting Service. Approximately 1,000 individuals participated at 50 locations across the U.S. and Canada to hear and discuss the results of the Project.
- A report on the Project, published by COPA in 1985 entitled "Assessing Long Distance Learning Via Telecommunications, Project ALLTEL: A Summary Report" which outlines the project's history, organization and results. Virtually all the copies of this publication have been disseminated or sold to date and reprinting is being considered.
- A joint policy statement adopted by the COPA Board on October 11, 1984 and by the State Higher Education Executive Officers Association on August 1, 1984 entitled "Policy Statement on Accreditation and Authorization of Distance Learning Through Telecommunications." Included in the policy statement are the implementation procedures which involve the use of an Institutional Profile for Telecommunications, a form which can be used commonly by accrediting bodies and States during their respective evaluative processes in relation to telecommunicated educational activities.
- Increased communications with SHEEO, including the creation of the COPA/SHEEO Liaison Committee.

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COMMON ACCREDITATION DATA BASE PROJECT

Sponsors: COPA and the National Center for Higher Education Management Systems (NCHEMS)
Duration: 18 months (1983-85)
Funding Source: Ford Foundation ($254,794)

Primary Purposes:

1. To recommend common categories and definitions of data for use by institutions, and/or programs within institutions, in meeting self-study and reporting requirements of regional, national, and specialized accrediting bodies;
2. To develop consensus among the accrediting associations concerning these common categories and definitions; and
3. To encourage adoption and use of the common data categories and definitions by the various accrediting associations.

Results of Project:

- A major COPA and NCHEMS publication entitled A Common Language for Post-secondary Accreditation: Categories and Definitions for Data Collection, 1985.
- Regional accrediting bodies are currently developing data forms within the framework of the common language for accreditation.
- Specialized accrediting bodies, such as the National Council for the Accreditation of Teacher Education, have adopted the common language as they have revised the structure of their data base.

Current State of Project:

In late February, 1985, planning for a third phase of the project not included in the Ford grant was begun. COPA and NCHEMS currently are seeking foundation support for a 12-month project: 1) to develop a common annual report and associated microcomputer software for regional accrediting agencies, and 2) to develop specialized annual reports with associated microcomputer software for at least five of the largest specialized accrediting bodies. The special needs of the national accrediting bodies will also receive attention during the project's Phase III. Revenues generated by the sale of microcomputer software and associated manuals are expected to support the development of specialized reports and software for use by other programmatic accrediting bodies.

It is hoped that taking this final step - i.e., translating the common data base into microcomputer software - will facilitate the ease with which institutions and programs can record and analyze a wide range of data and monitoring indicators pertinent to planning, evaluation, and quality enhancement.

Funding for this phase is outstanding in that we are still awaiting word from the McArthur Foundation.

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THE ROLE OF ACCREDITATION IN DIRECTLY IMPROVING EDUCATIONAL QUALITY

Sponsor: COPA and the U.S. Department of Education (Office of Planning, Budget and Evaluation)
Duration: One year (1985)
Funding Source: Took the form of honorarium for the author paid by the Department of Education

Primary Purpose:

This study was conducted at the request of the Office of Planning, Budget and Evaluation of the U.S. Department of Education for the expressed purpose of documenting the direct role of accreditation in improving educational quality in the nation's postsecondary institutions. In light of recent national reports concerning the state of higher education, a secondary purpose of the study was to suggest ways in which accreditation might become a participant in future national policies aimed at enhancing the quality of higher education.

Results of the Project:

COPA publication, The Role of Accreditation in Directly Improving Educational Quality (A study of 150 critical incidents and presentation of five indepth case studies) by Steven M. Jung of the American Institutes for Research, 1986.

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Future Projects

The COPA Board has requested that staff look into outside funding possibilities for the following projects:

Validitity and Reliability

Funds are being sought to put into practice recommendations developed by the COPA Committee on Assessing the Validity and Reliability of Accrediting Body Standards and Process. Financial assistance would be used to provide training programs for organizations undertaking review of their standards and accrediting processes.

Accreditation Library

Given the completion and publication of a Bibliography on Postsecondary Accreditation (1984), reflecting 529 books, articles and historical references from 1970-84 and 122 dissertations since 1935, the Board has expressed interest in developing a central library of accreditation available to researchers and practitioners. Outside funding will be necessary to complete this project.

RESEARCH ACTIVITIES

The Council both conducts research and maintains a research file which is available for anyone's use. In the file are data related to accreditation (e.g., its organization, scope, function, cost) gathered either by COPA, its members or interested others. COPA is a member of ACPAR, the Association Council for Policy Analysis and Research, a consortium of researchers from 26 national postsecondary educational organizations, which acts both as a forum for the sharing of research activities as well as a central research service on issues of common concern.

With the exception of directory-type publications which are updated on a regular basis, most of the research conducted by COPA is related to specific issues of concern, such as accrediting activities in relationship to foreign institutions or the selection, training and evaluation practices of accrediting bodies as they relate to site visitors.

Recently ACPAR published an Inventory of Research and Data Resources 1986, reflecting the primary activities of its members. COPA's contributions included the following:

I. ACCREDITATION
- Organization of Accrediting Bodies in Relation to Accreditation Function
- Institutional Evaluation of Accrediting Activities
- Growth of Health and Health-Related Accrediting Agencies
- Benefits, Services and Costs of Specialized Accreditation
- Selection, Training and Evaluation of Accreditation Site Teams
- Monitoring Requirements of Institutional Accrediting Bodies and the State for Off-Campus, Military Base and Study Abroad Programs
- Assessing Long Distance Learning Via Telecommunications: ALLTEL

II. COLLEGE AND UNIVERSITY CHARACTERISTICS
- Accredited Institutions of Postsecondary Education: Programs and Candidates

III. DIRECTORIES AND MEMBERSHIP REPORTS
- Organization, Membership and Publications of the Council on Postsecondary Accreditation
- A Guide to COPA Recognized Accrediting Associations

IV. GUIDES AND REFERENCES
- Postsecondary Accreditation: Categories/Definitions for Data Collection
- Bibliography on Postsecondary Accreditation
- Dissertation and Academic Research Related to Postsecondary Accreditation

V. STATE POLICIES
- Analysis of State Systems of Higher Education

In addition to those data resources included in the ACPAR Inventory are recent activities which include:

- Accrediting Activities in Relation to Foreign Institutions or Programs
- Regional Accrediting Standards:
  - Nontraditional education
  - Intercollegiate athletics
  - Study abroad programs
- Licensure and Certification Practices of COPA Recognized Specialized Accrediting Bodies

Of the data sources listed above, four are updated and disseminated on an annual or biennial basis:

Title	Frequency	Dissemination
The Balance Wheel for Accreditation (Organization, Membership and Publications)	Annual	- Membership - Public - as requested
A Guide to COPA Recognized Accrediting Associations	Biennial	- Membership - Public - as requested
Accredited Institutions of Postsecondary Education: Programs and Candidates	Annual	Published by Macmillan for ACE, which, in turn, administers the reference for COPA.
"Dissertations and Academic Research Related to Post-Secondary Accreditation"	Annual	- Membership - Higher Education Program Directors

Future plans for research activities include:

- the continued maintenance of a central file of data related to accreditation,
- the continued publication and dissemination of data resources requiring updating, and
- a continued commitment to researching issues of concern to the accrediting community, including investigating the feasibility of a central accreditation library (see section on Funded Projects).

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The following list represents the contents of the central research file and is intended to familiarize you with the scope of materials maintained.

ATTACHMENT - RESEARCH ACTIVITIES

Surveys and Analyses of COPA and Member Associations
(Research File)

I. General:

A. COPA/Department of Education Recognized Accrediting Associations

1. 12/82 analysis.
2. 3/84 analysis.

B. Growth of Accrediting Agencies (1982)

1. Chart depicting history of each association with:

a. NCA (1949-75)
b. NCRAA (1949-1963)
c. FRACHE (1964-1975)
d. COPA (1975-ff.)

2. Graph of history

C. Final Analysis of COPA Pilot Survey of 50 institutions re Alternative Financing of COPA (4/82)

D. COPA Staff Analysis--Management by Objectives (1983)

E. Dissertations Related to Accreditation

1. 3/83
2. 12/83

F. Classified Bibliography on Accreditation (1983-84)

G. Relationship of Dept of Ed - Recognized Agencies to Eligibility for Funding

H. Analysis of State Systems of Higher Education (Public & private) - 6/84

I. Judicial and Legislative Context for Disclosure of Accrediting Information (84)

J. 1984 ACPAR Inventory of Research and Data Resources (11/84)

K. Legal Issues and Case Law related to Accreditation (1985)

L. Representatives from foreign countries: visits to COPA (1985)

M. Institutions with Honor Codes (1985)

II. AIAB and ASAB Policies, Practices, Procedures, etc.

A. AIAB:

1. Cost of Federal Compliance in Higher Education (SACS-CC survey, 1976)

2. Chairmen, Regional Commissions (1982)

3. Institutional Accrediting Bodies: Statements of Ethical Practices 11/82)

4. Comparison of Numbers of Institutions with Accreditation Denied or Withdrawn; Interim Reports Required (1983)

5. Proprietary Schools: Accredited or Candidacy Status with Regional Associations (3/19/84)

6. Examples of Substantive Change (NW) - (1984)

7. AIAB Eligibility Requirements (1984)

8. Regional Standards on Intercollegiate Athletics (1982)

9. Regional Policies on Study Abroad (1984)

10. Perceptions of Regional Accreditation--North Central Ass'n (1981)

11. Regional (Senior Commissions) Statements on Nontraditional Institutions/Education (1986)

12. Transfer Policies of Regional Commissions (1986)

B. ASAB:

1. Summary of Data Reported in 1977 by Thirty-Eight (38) Specialized Accrediting Agencies (8/78)

2. Fees and Dues of 11 Specialized Agencies (1980-81)

3. Costs of Programmatic Accreditation for Allied Health Education in the CAHEA System: 1980 (Robert Parks--2/82)

4. Analysis of Programs Accredited by ABET in Engineering and and Engineering Technology (1982)

5. Number of Programs (Curricular Areas) Accredited by Specialized Association (1/83)

6. Programs Accredited by Specialized Agencies in Institutions Not Defined as Postsecondary Education Institutions (8/83)

7. Analysis of Relationships Between Specialized Accreditation and Certification/Licensure (10/83)

8. CAHEA: Length of Various Programs Accredited (11/83)

9. Update on Data reported in B.1. above, and General Information on Benefits, Services, and Costs of Accreditation (Jerry Wilson--12/83-3/84)

10. Total Accrediting Activity of ASAB Members (1982-83)

11. COPA Membership Fees for Specialized Accrediting Bodies (1983-85)

12. CAHEA Survey on Major Concerns about Allied Health Accreditation (1983)

13. Chart on Growth of Health & Health-Related Agencies (this century)

14. Compensation Surveys

15. Evaluation of free-standing institutions - Comprehensive criteria

16. Certification survey: Five Accrediting Bodies

17. Liberal Education Requirements: COPA-Recognized Accrediting Bodies (1985)

18. Duration of Accreditation (Ranslow) 1985

19. Structure of Accreditation Committees/Boards (Ranslow) 1985

20. Report of Association of Texas Colleges and Universities Commission to Study Specialized Accreditation. (1986)

C. AIAB and ASAB:

1. Annual Surveys:

   a. 1982--survey and analyses

      (1) Totals for Quantitative Portion of Survey (See II, C, 4)

   b. 1983--survey and analyses

      (1) Comparison of 1982 and 1983 Reports of Institutional Agencies on Accreditations Withdrawn or Denied, and on Interim Reports Required. (See II, A, 4)

      (2) Interagency Cooperation. (See II, C, 8)

      (3) Total Accrediting Activity of ASAB Members (1982-83) (See II, B, 10)

2. Maximum Length of Term of Accreditation Given (6/82)

3. COPA Associations Accrediting Institutions/Programs in Canada (6/82)

4. Totals for Quantitative Portion of Annual Survey (1982)

5. Survey on Institutional Evaluation of Accrediting Activities (1/83)

6. Costs of Accreditation (Analysis by Rosenbaum--10/83)
   (U. of Texas study: Jl. of All. Hlth (5/85)

7. Policies on Status of Students Enrolled in Institution/Program When Accreditation is Withdrawn (Yungmeyer--11/83)

8. Interagency Cooperation (1983)

9. Association Appeals Procedures (1983)

10. Association Organizational Charts (1983)

11. Association Charts, Time-Lines for Self-Study process (1983)

12. Association Annual Report Forms (1983)

13. Survey on Validity and Reliability of Standards (1983)

14. Accrediting Practices for Free-Standing, Single-Purpose Institutions (Kalkhof's survey and analysis--3/84)

15. Geog. distrib. of COPA-recognized Associations/Members

16. Preparation and Training of Evaluators (Cooney) - 7/84

17. Organization of Accrediting Bodies in Relation to Accrediting Function

18. Coordinated and concurrent site-visits (CAHEA)

19. Coordinated visit to Georgia State University (1977)

20. Guidelines for Awarding Terms of Accreditation (LCME) (1985)

21. Exit Interview Procedures (ALA) 8/85

RELATIONS WITH FEDERAL GOVERNMENT

As spokesman for accreditation at the national level, members of the COPA staff respond to all requests for information from any federal agencies, and provide testimony at various Congessional hearings on invitation. There are two federal departments however, with which COPA interacts regularly on issues of common concern: the Department of Education and the Department of Defense.

Department of Education:

The U. S. Secretary of Education is required by statute to publish a list of nationally recognized accrediting agencies and associations which the Secretary determines to be reliable authorities as to the quality of training offered by educational institutions and programs. Most institutions attain eligibility for Federal funds by holding accredited or preaccredited status with one of the accrediting bodies recognized by the Secretary, in addition to meeting other eligibility requirements. The Division of Eligibility and Agency Evaluation (DEAE) was established to deal with accreditation and eligibility matters. In addition, the National Advisory Committee on Accreditation and Institutional Eligibility was established to advise the Secretary on all matters pertaining to accreditation and institutional eligibility.

In its September 23, 1981 report, the COPA Self-Study Advisory Panel, cognizant of the major tensions that had up to that time characterized COPA/DEAE relationships and citing COPA's leadership function as a spokesman for accreditation at the national level, called for it to recognize its "major responsibility to develop relationships with and, where appropriate, to cooperate with other organizations and agencies including state and federal governments". The past five years have been characterized by an unusual spirit of cooperation and coordination between COPA and DEAE staff members, the results of which have been significant:

> The DEAE developed a formal proposal to change its review cycle to five years to conform with the COPA cycle, a proposal still undergoing review.
>
> After a joint study had indicated that there was a 67% overlap between COPA and ED criteria, a pilot project was developed to enable accrediting bodies scheduled for review by COPA and DEAE at approximately the same time to submit a single document; ten accrediting bodies have since taken advantage of this method for a joint review, and others are scheduled for the next few years. To facilitate this option, the DEAE formally recommended that its cycle of recognition be changed from four years to five years, thus bringing it into consonance with the COPA cycle. Approval of this change would permit COPA and the DEAE to adjust the overall schedule of reviews and allow many additional accrediting bodies to submit a coordinated application; unfortunately the recommendation still lies in the limbo of bureaucratic red tape.

Staff members from COPA and ED met regularly (usually monthly) for a sharing of common concerns and discussion of issues.

COPA staff were invited to attend meetings of the National Advisory Committee on Accreditation and Institutional Eligibility, and have briefed the Committee on the development of COPA policy and procedural statements on issues of concern to both groups, e.g. off-campus educational activities, disclosure and confidentiality of accrediting information, the validity and reliability of accrediting body standards and process. In addition, on March 6-8, 1984, this Committee devoted two days to a consideration of policy issues of direct relevance to COPA: (1) whether or not the Department of Education should require accrediting bodies to receive COPA recognition first as evidence of meeting ED criterion (c)(1) on national acceptance as a precondition for seeking ED recognition; (2) whether the Secretary should limit its recognition to accrediting bodies that accredit institutions as a whole, i.e., regional and national institutional bodies and specialized accrediting bodies accrediting free-standing institutions. On the second issue the Committee voted to recommend to the Secretary that federal recognition be so restricted since federal recognition should be only for purposes of determining eligibility for federal funds. On the first issue, they agreed with the COPA position that COPA recognition should not be required as a precondition for ED recognition, but recommended that the Secretary be empowered to accept actions of voluntary professional bodies engaged in recognition of accrediting bodies, e.g., COPA, as having fulfilled all or part of the criteria for recognition. Subsequently, however, the Advisory Committee voted to drop both recommendations.

With the departure of Secretary Bell and Assistant Secretary Elmendorff, plus personnel changes and significant personnel shortages in the DEAE over the last year, the regular meetings of the two staffs have been curtailed. Communication continues in other ways, however, and the same spirit of cooperation prevails with the National Advisory Committee and DEAE staff.

Department of Defense:

Relationships with the Department of Defense have centered on two different issues—(1) policies and procedures which stipulate that accreditation by a regional accrediting body is the only accreditation acceptable; and (2) efforts to develop a system of base-wide evaluation of voluntary educational programs on military installations.

National institutional accreditation:

There are five national institutional accrediting bodies recognized by COPA and the Department of Education which accredit specialized institutions: the Association of Independent Colleges and Schools, the

National Association of Trade and Technical Schools, the National Home Study Council, the American Association of Bible Colleges, and the Association of Theological Schools. Although each of these accrediting bodies is recognized by COPA and the Department of Education, having undergone the same rigorous process of review of standards, procedures, and practices as regional and specialized bodies, the first four of these (and particularly the first three) still are discriminated against by numerous organizations and groups that will not consider their accreditation equivalent. This is, for example, still the case with the Servicemembers Opportunity Colleges, and COPA continues to combat this discrimination through its representation on that group.

The same discriminatory practice is present within the Department of Defense with respect to the eligibility of certain institutions to provide education services to personnel under the tuition assistance program. The Navy allows personnel to utilize tuition assistance at any educational institution accredited by a body recognized by the Department of Education and/or COPA. The Army, Air Force, and Marine Corps, however, have adopted policies which exclude institutions accredited only by the national institutional bodies. COPA staff members have wrestled with this problem on all levels of the Services. Legislation has now been passed which directs the military services to implement policy making all students attending institutions accredited by agencies recognized by COPA and the Department of Education eligible for military tuition assistance.

Installation-wide evaluation of voluntary education programs:

In April, 1983, the COPA Assembly of Institutional Accrediting Bodies adopted a position paper developed by Robert Kirkwood, Executive Director of the Middle States Commission on Higher Education and Chairman of the Assembly. The paper endorsed a plan for installation-wide evaluation of voluntary postsecondary education programs on military installations, and outlined the institutional, military, and accrediting body responsibilities in ensuring the quality of such programs. Discussions with representatives of the various services concerning this proposal began immediately, and presentations have been made at conferences here and abroad.

The Air Force and Army were reluctant to move in this direction, but the Navy indicated a willingness to proceed with three pilot reviews. Discussions and negotiations with the Navy Command for Education and Training and the Chief of Naval Operations led to the first installation-wide review at Memphis in February, 1985. All education programs were reviewed as a whole in terms of their relations to each other, to institutional and installation objectives, and in relation to military as well as institutional responsibility for the quality of programs offered.

Discussions continued with the Air Force over the next few months. In the spring of 1985, an idea which had been first proposed in October, 1981, for an internship of education service officers with accrediting

organizations, came to fruition with the appointment of Michael Curtis, head of the voluntary education program for the Tactical Air Command, as an intern with the COPA Office. The internship was from March 14 to May 24, and included on-site visits, workshops, conferences, and individual training sessions to achieve its purpose: to enhance the effectiveness of Air Force Educational Program Managers in areas where the accrediting community has significant impact on the quality and operation of voluntary off-duty education programs in the Air Force.

Shortly after the completion of the internship, a joint COPA/Air Force document was developed outlining responsibilities for installation-wide reviews at six Air Force installations, one in each of the six areas where regional associations conduct accrediting activities. These reviews will take place in 1986.

Within the last few months the Army has also reversed itself. It has developed a statement of responsibilities similar to those of the Navy and Air Force and has designated three bases to participate in the program.

Thus, the program developed by the Assembly of Institutional Accrediting Bodies through the Council in cooperation with the Departmnent of Defense has been accepted on a trial basis by the Navy, Air Force, and Army. It will become progressivley important to evaluate the results of these pilot visits and their effectiveness, and to determine whether the installation-wide program should become standard cooperative practice.

RELATIONS WITH THE STATES

The primary source of non-tuition funding for postsecondary education has for some time been the states. With the decrease in federal funding this promises to be even more the case in the future. Thus the critical focus of governmental activity in relation to higher education in general and accreditation in particular is likely to be the states rather than the federal government. The priority section of the 1982 COPA Self-Study report called on COPA "to open discussion with state agencies and organizations to deal with areas of separate and mutual concern, areas of cooperation and tension, state level accountability and its relation to accreditation, state authorization of institutions to operate and grant degrees... A continuing strategy for dealing with state issues as well as education of state leaders in relation to accreditation is essential." A series of developments have taken place in the carrying out of such a continuing strategy.

1. Cooperative Project on Long Distance Learning via Telecommunications (Project ALLTEL).

   At the public hearings held by the 1981 Self-Study Advisory Panel, the then President of the State Higher Education Executive Officers (SHEEO), Dr. Sheldon Knorr, Commissioner of Higher Education in Maryland, suggested the possibility of developing a joint COPA/SHEEO proposal for a project to deal with the emerging issue of quality assessment and enhancement in relation to long distance learing via telecommunications. This issue clearly involves both accrediting bodies and state agencies charged with licensing or authorizing institutions to operate and grant degrees. It involves both interstate and interregional operations.

   As a result of this suggestion a joint proposal was developed by COPA and SHEEO and submitted to the Fund for the Improvement of Postsecondary Education (FIPSE). FIPSE awarded COPA and SHEEO some $229,704. The project was carried out under the direction of a steering committee consisting of five representatives of each organization plus the presidents of the two organizations who alternated in chairing the meetings. Dr. Knorr had been succeeded as president by Dr. Gordon Davies, Director of the Virginia Council of Higher Education. In addition to the Steering Committe the project involved three task forces and a technology advisory committee. These included not only representatives of COPA and SHEEO but of the academic, telecommunications, legal and business communities.

   In addition to the funds from FIPSE the Annenberg/CPB Project provided $10,000 towards a nationwide teleconference to help disseminate the results of the project. This teleconference included more than 1000 people at 50 different sites around the country.

   A major result of the project was to provide a series of principles and a framework for dealing with institutions offering credit and degree programs via telecommunications on a cooperative basis utilizing both accreditation and home state authorizations to assure consumer protection

and educational quality. The project also had major implications for off-campus operations in general and their relation to authorization and accreditation.

However, of equal importance the project demonstrated the possibility of joint projects and cooperative approaches to common problems by COPA and SHEEO. The reports of the project were adopted both by SHEEO membership and by the COPA Board. In addition COPA and SHEEO agreed to establish a continuing Liaison Committee not only to monitor progress in implementation of Project ALLTEL but to deal with any items or issues referred to it by either organization.

2. COPA/SHEEO Liaison Committee.

The Liaison Committee was authorized by SHEEO and the Board of COPA in the summer and fall of 1984. It has had two meetings in 1985 and is scheduled for a third this summer (1986). Current members of the committee from the accrediting community include Dr. J. Rhodes Haverty, member of the COPA Board, Dr. Robert Kirkwood (MS/CHE), Dr. Richard Kunkel (NCATE), Dr. Thurston Manning (NC/CIHE), Dr. James Phillips (AICS), Dr. James Rogers (SA/COC), and Dr. Douglas Ward (AOsteoA). The SHEEO members include Dr. Robert M. Bersi (NV), Dr. John F. Corrozi (DE), Dr. Gordon K. Davies (VA), Dr. Gordon Foster (SD), Dr. T. Edward Hollander (NJ), Dr. Sheldon Knorr (MD), and one vacancy. In addition the President of COPA and the Executive Director of SHEEO serve as ex officio members. The chairmanship alternates by year between the two groups--Dr. Davies during the first year and Dr. Kirkwood during the second.

The issues with which the liaison committee has dealt and in some instances made recommendations to the sponsoring bodies include such items as:

1. The need for regional meetings of state higher education executive officers and their regional accrediting counterparts

2. Need for effective consultation and communication by SHEEO members of any system or state conditions relevant to accrediting decisions

3. Need for accrediting bodies to inform state agencies as well as institutions of impending accrediting visits and actions

4. Need to develop more effective and uniform means of preserving records of defunct or merged educational institutions

5. Need for review of state licensure, registration and accreditation issues

The committee thus has become a focus for considering common problems and appropriate referral of these to the sponsoring bodies for action or response.

3. SHEEO and COPA Meetings.

Over the past five years representatives of SHEEO have attended both COPA Board and Assembly meetings and COPA representatives have been involved with SHEEO meetings. SHEEO has been represented by its president and its executive secretary at COPA meetings. They have taken part in Assembly discussions and made presentations to the COPA Board. In turn COPA has been represented at the SHEEO annual meetings by the COPA president who has spoken at three of the meetings and by Dr. Kirkwood and Dr. Bemis (NW/COC).

4. COPA Professional Development Session.

At the 1986 New Orleans meeting, the Professional Development Session on Wednesday, April 16, was devoted to the subject of Accreditation and the States: Responsibility for Quality Education. The keynote address outlining the issues was given by Dr. Robert Berdahl, Acting Executive Director of the new National Center for Postsecondary Education Governance and Finance at the University of Maryland and long a student of state and accreditation affairs. Representatives of COPA and the states took part in the general panel and the various separate sessions which were devoted to "State Licensure, Credentialing and Accreditation," "Relevance of Testing: The States and Accreditation," "Accreditation and Statewide Planning," and "Outcomes Measurement and Public Accountability." Dr. Joe Leone, Chancellor, Oklahoma State Regents for Higher Education; Dr. Donald J. Nolan, Deputy Commissioner for Higher Education of the New York Board of Regents; Dr. James Mingle, Executive Director of SHEEO; and Dr. Edward Goldberg, Assistant Chancellor for Academic Affairs of New Jersey were among the participants.

5. In addition to such general group involvement, representatives of COPA and members of the COPA staff have been involved in meetings and consultations with a series of different states and state agencies. These include:

   a. Speaking engagements at state conferences in such states as Alabama, California, Florida, Maryland, Minnesota, North Carolina, Ohio, Oklahoma, Tennessee, Texas, and Virginia

b. Consultation relating to legislation and accrediting issues: Arizona, California, Colorado, Florida, Maryland, Maine, Nebraska, New Jersey, Oklahoma, Pennsylvania, and Tennessee

c. Consultation on state studies of accreditation including testimony before special commissions: California, Florida, Pennsylvania, and Texas.

6. Liaison with State Groups Other than SHEEO.

a. Education Commission of the States.

The President of COPA serves as an advisory commissioner to ECS involving a series of 3 to 5 meetings per year. The new President of ECS, Dr. Frank Newman, met with representatives of COPA at the October 1985 meeting in Denver to discuss continued relations of COPA with ECS and state officials through ECS.

b. PROANDI - Persons Responsible for Oversight and Approval of Nonpublic Degree-granting Institutions.

This is an organization of the persons, usually within a state higher education agency, with responsibility for carrying out the state responsibility for authorizing institutions to operate and grant degrees. Since all recognized accrediting bodies require an institution to be authorized to operate in the state in which it exists before it can be considered for accreditation, this group is of considerable importance for the accrediting community. Representatives of COPA have been involved in the PROANDI meetings and helped keep their members informed of developments in accreditation. They in turn have helped to keep the COPA file on authorizing legislation and regulations up to date.

c. National Governor's Association.

Under the leadership of Governor Alexander of Tennessee, the National Governor's Association has focussed its attention in 1985-86 on education. A series of task forces has been established related to specific educational issues. One of these, a Task Force on Quality of Undergraduate Education, is chaired by Governor Ashcroft of Missouri. The Task Force has had two meetings, one in St. Louis and one in Washington. Dr. Milton Blood of the American Assembly of Collegiate Schools of Business attended the St. Louis meeting as an observer for COPA. Governor Ashcroft requested that the President of COPA testify at the Washington meeting in March. The staff has continued to stay in contact with Governor Ashcroft and the task force.

ACRONYMS USED IN BACKGROUND MATERIALS

AAC	Association of American Colleges
AACJC	American Association of Community and Junior Colleges
AACRAO	American Association of Collegiate Registrars and Admissions Officers
AAHE	American Association for Higher Education
AASCU	American Association of State Colleges and Universities
AAU	Association of American Universities
ACE	American Council on Education
ACPAR	Association Council for Policy Analysis and Research
AGB	Association of Governing Boards of Universities and Colleges
AIAB	Assembly of Institutional Accrediting Bodies (COPA)
AICS	Association of Independent Colleges and Schools
ANPEO	Assembly of National Postsecondary Educational Organizations (COPA)
AOsteoA	American Osteopathic Association
ASAB	Assembly of Specialized Accrediting Bodies (COPA)
ASHE	Association for the Study of Higher Education
CASE	Council for Advancement and Support of Education
CGSUS	Council of Graduate Schools in the United States
COPA	Council on Postsecondary Accreditation
CORSAC	Council on Regional School Accrediting Commissions
CSAA	Council of Specialized Accrediting Associations
DEAE	Division of Eligibility and Agency Evaluation (U.S. Department of Education
DOD	Department of Defense
ECS	Education Commission of the States
FIPSE	Fund for the Improvement of Postsecondary Education
MS/CHE	Middle States Association of Colleges and Schools/Commission on Higher Education
NACUA	National Association of College and University Attorneys
NAFSA	National Association for Foreign Student Affairs
NAICU	National Association of Independent Colleges and Universities
NASAA	National Association of State Approval Agencies (for Veterans Administration)
NASULGC	National Association of State Universities and Land-Grant Colleges
NCATE	National Council for Accreditation of Teacher Education
NC/CIHE	North Central Association of Colleges and Schools/Commission on Institutions of Higher Education
NCHEMS	National Center for Higher Education Management Systems
NUCEA	National University Continuing Education Association
PROANDI	Persons Responsible for Oversight and Approval of Nonpublic Degree-Granting Institutions
SA/COC	Southern Association of Colleges and Schools/Commission on Colleges
SHEEO	State Higher Education Executive Officers Association

Council on Postsecondary Accreditation

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COPA SELF-STUDY ADVISORY PANEL

Findings & Recommendations

submitted to

The Board of Directors

The Council on Postsecondary Accreditation

October 2, 1986

October 2, 1986

Dr. Ellis McCune
Chair
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One Dupont Circle, N.W., Suite 305
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Dear Chairman McCune:

On behalf of the Self-Study Advisory Panel to the Council on Postsecondary Accreditation, I am pleased to submit our final report. The members of the Panel met in three sessions and carried out special assignments before and between meetings. The work of the Panel was facilitated by background materials assembled and prepared beforehand.

At its meeting on June 30 and July 1 and 2, the Panel heard oral testimony from 10 persons representing the academic and accrediting communities and state and local governments. In addition, it received written reports and comments from 20 different organizations and individuals.

The Panel has been concerned not only with the specific charge to review the objectives, priorities, governance and financing of the Council but also with the larger context of higher and postsecondary education, of which accreditation is an essential part. The Panel is particularly concerned with the role that accreditation should play in focussing academic concern on achieving quality educational programs that serve the interest of our students while strengthening the ability of our nation to compete effectively in a difficult and changing world. Thus, in addition to specific recommendations to the Council, the report also includes general recommendations to all who do or should participate in the self-regulatory accrediting system of postsecondary education in this country.

I want to express my deep appreciation to the hard working members of the Panel and to all those who provided information and suggestions to the Panel during its deliberations.

Cordially,

C. Peter Magrath
Chairman

TABLE OF CONTENTS

Letter of Transmittal i

Table of Contents ii

Panel Membership iii

Charge to the Panel and Overview of the Study v

I. The System of Accreditation 1

II. Objectives of the Council on Postsecondary Accreditation . . . 6

III. Priority Issues 9

IV. Governance and Structure 13
The Board 13
Board Committees 15
Assemblies 16

V. Finance 20

VI. A Postscript for the Future 22

Appendices 24

I. Persons Submitting Written Testimony 25

II. Summary of Written Testimony 26

III. Speakers List: Oral Testimony 29

IV. Summary of Oral Testimony 30

V. Research and Development in Accreditation (Background for Recommendation 8) 35

VI. Suggested Changes in Articles of Incorporation and Bylaws 37

A. General 37
B. Executive Committee 38
C. Nominating Committee 39
D. Committee on Professional Development 40
E. Committee on State Relations 41

VII. Glossary of Acronyms 42

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CHARGE TO THE PANEL AND OVERVIEW OF THE STUDY

In October of 1981 the Board of the Council on Postsecondary Accreditation received and acted upon the report of a special Self-Study Advisory Panel. The Board adopted the objectives, most of the structure and the priorities recommended by the panel and revised the bylaws to reflect these recommendations in April of 1982. It is these objectives, structures and priorities the Council has been operating under since July of 1982. Among the recommendations adopted by the Board was that the objectives, structures, financing and priorities be reviewed at least every five years.

To this end, at its meeting in Denver on October 11, 1985 the COPA Board determined that a new Self-Study Advisory Panel would be formed to conduct the self-study between April and October, 1986 and to report to the Board at its Fall meeting. The charge to the Self-Study Advisory Panel was as follows:

1. To review and assess the objectives of the Council on Postsecondary Accreditation in terms of their adequacy and relevance to current and anticipated conditions in postsecondary education and accreditation;

2. To review and assess the extent to which the governance, structure and operations of the Council have enabled it to meet its objectives and are conducive to its continuing to do so;

3. To review and assess the current financing of the Council in terms of its adequacy to enable the Council to achieve its objectives;

4. To review and assess the priorities of the Council in light of its objectives and suggest additional issues for priority consideration; and

5. To submit a report and make appropriate recommendations in each of the above areas to the Assemblies and the Board in October of 1986.

At the same meeting, the Executive Committee was charged with appointing the Self-Study Advisory Panel. Immediately following the October Board meeting a request went to all COPA constituencies for nominations of persons for membership on the Panel. Some 56 persons were nominated. The Executive Committee met in Chicago on December 11 to review the nominations and select the Panel members. With the exception of two persons who were to be out of the country during the period of the review, all the committee's first choices accepted appointment to the Panel. At the same meeting the Executive Committee accepted a general work plan for the study.

The work plan called for an initial two-day meeting of the Panel in May 1986 to review the charge and identify major issues and concerns to be addressed. A second more extended meeting with public hearings would be held in late June or early July and a final meeting for completing the report would be held in mid August. All three meetings would be held in Washington.

The first meeting was held on May 27 and 28. In preparation for the Panel meeting background materials were prepared that included the following:

1. Historical background
2. Activities as related to priorities: 1982-1986
3. Goals, objectives, and work responsibilities related to budget: 1984-85
4. Governance and finance including historical developments: 1975-1981
5. Policy development: 1981-1986
6. Structure, role and activities of the Recognition Committee: 1982-1986
7. Assemblies and their activities: 1982-1986
8. Professional development program
9. Publications and Public Affairs
10. Funded projects
11. State and federal relations: 1982-1986

The first meeting was spent identifying issues to be addressed in the light of the four aspects of the charge. The Panel developed a list of policy issues and structural issues to be addressed. The former involved the relation of COPA and accreditation to the larger community. The latter involved adequacy and/or need for change in current COPA structure in terms of its ability to deal effectively with the former. During the first meeting the members of the Executive Committee met with the Panel to take part in Panel orientation. At the request of the Panel the members of the Executive Committee agreed to continue as consultant members to the Panel at subsequent meetings.

The second meeting was held on June 30 and July 1 and 2. Prior to the meeting written testimony had been received from some 20 persons and organizations relating to the four areas of the charge. The members of the Panel had an opportunity to review the written materials beforehand as well as at the meeting. Monday afternoon June 30 was devoted to hearings at which 10 persons presented a wide range of testimony. These included representatives of institutional and specialized accrediting bodies, national higher education organizations, the United States Department of Education and state higher education agencies.

During the three days of deliberations, part of which were spent in subgroups, the Panel considered the various reports, background materials and testimony and was able to approach consensus on (1) the need for placing any recommendations within the context of current national concern with postsecondary educational quality, (2) modifications in COPA statements of purpose and objectives, (3) reassessment and restatement of COPA priorities, (4) possible modifications in COPA governance, and (5) reassessment of COPA's financial base. It was agreed that a draft report with recommendations would be prepared and distributed to the Panel members prior to the next meeting.

Review, revision and modification of the draft report constituted the primary agenda at the August 18-19 meeting. In addition, an informal discussion session was held on the morning of August 18 with the staff executives of the national higher education organizations currently members of the Assembly of National Postsecondary Educational Organizations about the particular problems and proposed recommendations related to that Assembly.

By the end of the meeting the substance of what would constitute a final report was agreed upon. A draft of the final report was subsequently prepared, circulated to the members of the Panel, and then further revised. What follows constitutes the final report and is incorporated in the Board Agenda Book for the meetings of the Assemblies and the Board on October 2 and 3, 1986. Under the able chairmanship of Dr. C. Peter Magrath, the hard working Advisory Panel has been able to complete its assignment and present its report to the Assemblies and Board as scheduled.

I. THE SYSTEM OF ACCREDITATION

Preamble and General Recommendations

The basic system of accreditation in American higher education is alive and working--and in most cases working better than it did in the previous decade. The structural reorganization that led to the creation of the Council on Postsecondary Accreditation (COPA) and the accompanying changes in the general accreditation community during the past ten years have served well the only interest that should be paramount in accreditation--our nation's interest in high quality education. This report builds upon the guidelines and accomplishments stimulated by our predecessors' study, Final Report of the 1981 Self-Study Advisory Panel, and the excellent 1986 statement, Educational Quality and Accreditation, produced by COPA.

Nevertheless, while we recommend a number of relatively modest structural changes in the Council on Postsecondary Accreditation, we are convinced that there is an urgent need for all participants in the process of accreditation--accrediting agencies, colleges and universities, national higher education associations, and the Council on Postsecondary Accreditation itself--to address not so much the letter but the spirit, and the future, of the total accreditation system. There is today constructive ferment in American higher education, much of it understandably focused on undergraduate programs, and the system of accreditation can--and should--play a major role in addressing the issues involved.

We stress what is perhaps obvious but too often neglected: accreditation, whether of a particular professional program or of an entire college or university, is a means, not an end. The end must be the nurturing and the development of high quality educational programs--not just adequate programs that meet minimal standards. The goal of accreditation in education is to promote programs and institutions that are excellent and that demonstrate in their actual performance the highest possible quality, whether measured in terms of the learning of individual students, the significance of the research efforts, or the value of the educational service that has been provided. Measured against this goal, we believe that accreditation in America in 1986 falls short of providing the quality assurance that our nation deserves from our private and public colleges and universities as we look to the Twenty-First Century, and that our civic and political leaders increasingly, and correctly, demand.

We believe that there are many ways in which the accreditation system can be improved. Such improvements depend far more upon motivation and attitudinal commitments among the key participants in the accreditation and higher education community than they do on structural changes in the machinery of accreditation. We believe, also, that all of us concerned with improving American higher education and furthering the push for higher quality must candidly acknowledge this fact of educational life: a significant number of

perceptive and interested observers look critically upon many aspects of the accreditation system and the quality of much of the teaching and learning done in our classrooms. We note the most significant of these criticisms, not to finger point or assign blame, but to emphasize that there is a major challenge before the house of higher education. All of us in higher education have work to do--if we are committed to improving quality in postsecondary education.

Without listing all of the possible criticisms and reservations about accreditation and its relationship to higher education, we note that there are some issues that clearly warrant attention. Many close observers of the educational scene--ourselves included--believe that far too often the participants in the accreditation process focus their efforts on minimal, barely adequate, standards. These, moreover, are often imposed in a highly technical and bureaucratic fashion, without addresssing the challenge of promoting improved standards in our teaching and learning programs. Put another way, the value of getting a program or a college "accredited" is seen as a useful and important license that serves the perhaps narrower interest of the licensor and the licensee without sufficient regard to the interests of the ultimate licensee--the United States and its public interest in quality higher education.

We believe, in short, that at least four general criticisms are valid. The first is that too often accreditation is based on minimal statistical standards without an insistence on higher quality in the process of teaching and learning and general education. For the competitive years ahead, accreditation grades of "D" and "C," whether for an entire college or a program within it, should be viewed as inadequate. Our accreditation standards should set their sights unequivocally on the pursuit of "B's" and "A's"!

Second, it is often said, and unfortunately at times with justification, that accreditation, particularly by representatives of specialized professional and occupational programs, is self-serving. Either the specialized accrediting body is perceived as promoting a self-protective system to control a market in one way or another, or it is believed that the specialized programs in our nation's colleges and universities are in league with their professional colleagues from the national profession in a back-scratching kind of relationship.

Third, accrediting at times focuses too narrowly on a particular program without due regard of the total educational context and mission of the college or university.

Equally true--and this is our fourth concern--too many college and university presidents have ignored the process and the potential of accreditation. For whatever reasons, they have found other priorities more compelling for their personal and institutional agendas. To the extent that this particular criticism is valid, it is consistent with recent findings that relatively few college and university presidents directly involve themselves with educational issues. Might not a wholesome interest in accreditation, both nationally and for their particular colleges and universities, provide a marvelous vehicle to reverse this sorry state of affairs?

We do not list these criticisms and concerns, and surely any perceptive observer could add to the list, either to assign blame or to assess in depth the validity of these criticisms. The blunt fact is that these kinds of criticisms are stated, often privately and quietly, though at times more publicly by critics of higher education, by state legislators and governors, and by national leaders. Moreover, even if the critique is unjustified, the further fact remains that those of us truly dedicated to the highest quality system of American higher education have a vested interest in reinvigorating the accreditation process so that it serves the ultimate ends that should unite us all: quality educational programs that serve the interests of our students while strengthening the ability of our nation to compete effectively in a tough world.

We therefore believe that the significant agenda for all participants in the accreditation process is as simple and direct as it is challenging and demanding of our highest personal and institutional commitment: a commitment to making the accreditation process a vehicle for achieving higher quality in all higher education programs; a commitment to having that process, both in fact and in perception, serve our nations's interest; and a commitment to moving beyond some of the parochial and narrow practices of the past that have infected--and debilitated--us all. In short, we challenge both ourselves as individuals, and all others who are involved in higher education, including our public officials, to work together in developing a new vision for accreditation as a vehicle for the improvement of high quality education. None of this, of course, will happen unless there is both a renewed and more focused vision and a commitment to strategies that bring us together on behalf of the public interest in high quality education in our public and private colleges and universities. Such a commitment, we note, is consistent with our national aspirations and with our ideal of access and educational opportunity for all Americans regardless of social, economic or ethnic backgrounds.

The ultimate recommendation we make, therefore, is attitudinal, not mechanistic or structural. We ask that all accrediting bodies and institutions put at the top of their agenda the question, not of how we maintain merely adequate standards in educational programs, but how we elevate those standards on the premise that "adequate" or "satisfactory" or "passing" may once have been good enough--but are not good enough for the next century.

We ask the presidents of our private and public educational institutions, whatever their size and mission, to address themselves single-mindedly to the proposition that all accreditation outcomes should be premised on the general public good, not the narrower interest of the accrediting body, the academic program, or the college or university itself. We similarly ask that all accrediting bodies, and the professional men and women who lead them, think of themselves first and foremost as educators, committed to tough-minded standards for the assessment and measurement of quality in the programs that they canvass. And we ask also that these accreditor educators approach their important and delicate assignments with the attitude of helping a program and a college or a university to do more; to be better; and to achieve its full potential.

At the same time, we insist that all accreditation should focus on the general, not the narrow, good. The more specialized or professional accrediting bodies should dedicate, or rededicate, themselves to furthering the general public good by a sensitive understanding and appreciation that a particular professional or specialized program is a program within a college or university whose total educational mission and health ought to be as much a focus of the accreditors' concern as the quality and health of the particular program under examination. Any program in any college or university sooner or later--and we believe sooner--has to be seen in the context of the total mission of the college or university and with a due regard for other appropriate educational missions being served by the institution.

We believe, also, that college and university presidents must be encouraged, indeed recruited, to play more direct and active roles in the accreditation community, along with academic vice presidents, deans, and faculty. There are always a hundred and one reasons why all of us are too busy. But if the will and the interest are there, we believe that more college and university presidents can be encouraged to participate as generalists not only on accreditation teams, but in leadership positions in our nation's specialized, regional, and national accrediting bodies. There are of course many other critical participants in the quest for an improved system of higher education, and these concerned and committed participants, such as our nation's higher education coordinating officers organized through the State Higher Education Executive Officers (SHEEO), our educationally concerned legislators and governors organized through the Education Commission of the States (ECS) and the National Governors Association (NGA), and the National Conference of State Legislatures (NCSL) must be encouraged to participate positively in examining questions of accreditation and educational quality. And just as significantly, we believe that the nation's higher education associations, currently organized through one of the three assemblies of the Council on Postsecondary Accreditation, must be encouraged, indeed urged, to participate, along with their institutions and presidents, even more actively than has been the case up until now.

The architecture of our report is built on the assumption that our views on the challenge of accreditation in higher education are far more important than the structural changes and amendments we propose. We specifically urge that, just as soon as possible, a major and inclusive conference on accreditation and quality in higher education be convened under the auspices of the Council on Postsecondary Accreditation and the American Council on Education and other key participants in the accreditation community. Such a conference should be constructed so as to be practical and specific. It should address the real questions before the national house of higher education, questions that are legitimately of concern to our elected, governmental, and civic leaders. It should, moreover, be organized around the fundamental assumption that accreditation is not a cookbook mechanical process on "how to get certified," but an educational vehicle to further the highest possible quality in all of the programs of our colleges and universities.

Before we turn now to our comments and specific recommendations to COPA for structural and mechanical improvements, the thrust of our report would be lost if we did not reaffirm our emphatic judgment about the key challenges before all of us involved in postsecondary education. These challenges, we believe, are ones of attitude, shared commitment, and a focus on making accreditation a synonym not for academic "certification" and therefore for survival, but a synonym for exciting education that develops the full potential of our students.

Accordingly, we first propose these general recommendations to all who participate in the system of accreditation and higher education:

- *A fundamental purpose of accreditation should be recognized to be this: to focus on the educational values of the institution or program in order to elevate its standards and quality without being trapped into a narrow counting of minimal standards measured by mundane statistics.*

- *The processes of accreditation should deemphasize narrow technical standards, whether in a specific program or an entire college or university, and instead emphasize the pursuit of educational standards and outcomes of the highest possible quality appropriate to the extraordinarily competitive world that the United States now faces.*

- *The presidents of our nation's colleges and universities should become more directly involved in accreditation, viewing it as a vehicle for the furtherance of their educational obligations and aspirations.*

- *The accreditors should view themselves first and foremost as educators, significant partners in the process of teaching and learning dedicated to improving standards relevant to the mission of the college, university, and programs which they assess.*

- *The Council on Postsecondary Accreditation, the American Council on Education, and other key participants in the accreditation community should convene, as quickly as conveniently possible, a major and inclusive national conference on accreditation and quality in higher education.*

II. PURPOSES AND OBJECTIVES

In 1981, the Advisory Panel proposed purposes and objectives which were "directly related to the nature and function of accreditation in the American postsecondary education scene and to the leadership role which COPA should perform as the national coordinating and monitoring organization for accreditation." The general statement of purpose and three major objectives were adopted by the Board and currently appear in COPA's Articles of Incorporation and various publications, including The Balance Wheel for Accreditation.

The Advisory Panel has reaffirmed many of the philosophical bases and much of the functional content of the purposes and objectives offered by its predecessor in 1981, with some alteration in emphasis.

The objectives currently number three, focusing on the provision of (1) the recognition function, (2) national leadership and (3) services to accrediting bodies, postsecondary educational institutions and the public. The Advisory Panel reaffirms these and adds a fourth, to appear as the premier objective: COPA's role in improving the quality of postsecondary education.

Although educational quality is a recurring theme on a national scale in recent months, accreditation has, since its inception, represented the academic community's primary means of self-regulation and quality assessment as an important means to quality enhancement. COPA thus has responsibilities to accrediting associations, students, institutions, programs and the public to improve the quality of postsecondary education. A primary objective in this vein is the recognition process, or the monitoring of the accrediting process as it is carried out by the voluntary accrediting associations, assuring students and the public that it is conducted effectively and responsibly.

Closely related to the enhancement of educational quality is COPA's national leadership for postsecondary accreditation. As an official voice for accreditation at a national and state level, COPA has a major responsibility for helping to create an awareness of the role and value of accreditation among institutions, faculties, governing boards, state and federal governments and the general public in developing understanding and support for the accrediting process. Further, COPA has a major responsibility to develop relationships with and, where appropriate, to cooperate with and urge cooperation among educational leaders, institutions or programs and federal and state agencies in strengthening the role of accreditation.

Finally, COPA is a service organization. It provides a series of services to accrediting bodies, educational institutions and programs and to the public, including: quality improvement assistance, help in the development of national accreditation policy, research activities, professional development programming, the monitoring of governmental activities and publications.

With these factors in mind, the Advisory Panel's recommendations reaffirm with modifications where appropriate the following statements of purposes and objectives:

Recommendation 1. *Purposes:*

The Council on Postsecondary Accreditation (COPA) is a nongovernmental organization that works to foster and facilitate the role of accrediting bodies in promoting and insuring the quality and diversity of American postsecondary education. The accrediting bodies, while established and supported by their membership, are intended to serve the broader interests of society as well. To promote these ends, we reaffirm the role of COPA in recognizing, coordinating and periodically reviewing the work of its member accrediting bodies, and the appropriateness of existing or proposed accrediting bodies and their activities, through its granting of recognition and performance of other related functions.

Recommendation 2. *Objectives:*

COPA seeks to accomplish the following major objectives:

1. *Promote, improve, and assure the quality of postsecondary education in the United States.*

2. *Recognize accrediting bodies that accredit institutions and programs of postsecondary education on the basis of demonstrated need and specified standards related to accrediting policies and practices.*

3. *Provide national leadership for postsecondary accreditation and the enhancement of educational quality by:*

    - *Cultivating an understanding of the role, nature and significance of accreditation,*
    - *Serving as an official voice at national and state levels for accreditation,*
    - *Initiating conferences and activities for the purposes of improving the process of assessment, and*
    - *Promoting active collaboration and/or interaction among educational leaders, institutions/programs and federal and state agencies.*

4. *Provide services by:*

    - *Assisting institutions, programs and accrediting bodies to improve accrediting processes, policies and practices,*
    - *Coordinating the professional development of the membership and interested parties,*

- *Providing a forum and vehicle for discussion and development of national accreditation policy,*

- *Facilitating coordination among accrediting bodies,*

- *Encouraging, sponsoring, conducting and publishing research relating to the understanding and improvement of accreditation,*

- *Monitoring federal and state activities related to accreditation and informing the accrediting community, and*

- *Publishing annual lists of recognized accrediting bodies and the institutions and programs which they accredit and publishing research findings and other information on accreditation.*

III. PRIORITY ISSUES

Written and oral testimony presented by the various constituencies of accreditation, combined with current literature and perspectives concerning the general environment of postsecondary education, generated issues with which COPA should be concerning itself. Considering these, the Advisory Panel identified key priorities for COPA's work and recommended vehicles for their implementation.

The Panel recognizes that priorities should be constantly reviewed as circumstances change and that the priorities identified should be used as guidelines subject to change, and not as fixed concerns. In this sense the recommendations of the Advisory Panel on priorities differ from the recommendations on objectives, governance and finance in that they underline desirable emphases rather than constitute a specific set of actions that should be taken.

With these factors in mind the Advisory Panel calls attention to the following priority issues:

Recommendation 3. *Improve the quality of postsecondary education by acting as a catalyst for quality improvement.*

This priority is anchored in the understanding that American postsecondary education, including its forms and users, is diversified and that quality is relative to the specific nature of the entity being evaluated. In this vein, the Advisory Panel urges COPA to:

- Initiate a national conference and/or a series of meetings focussed on issues of quality improvement, involving or sponsored by such governmental and independent groups as the Education Commission of the States, the State Higher Education Executive Officers and the American Council on Education.

- Encourage consideration and development of national indicators of educational quality as relevant to institutional accreditation through continuing research, review by institutional accrediting bodies and discussion at the national conference and other appropriate forums.

- Promote discussion and action on issues of concern such as the liberal content of professional education and balancing of professional studies and the liberal arts.

Recommendation 4. *Strengthen relations with the States.*

In light of increasing State involvement in issues of quality assessment, accountability, and oversight the accrediting community should give high priority attention to state relations. In this vein, COPA and its accrediting bodies are encouraged to:

- Strengthen the role of the existing Council on Postsecondary Accreditation/State Higher Education Executive Officers (SHEEO) Liaison Committee (see Recommendation 14);

- Develop linkages with such state bodies as the Education Commission of the States, the National Governors' Association, the National Conference of State Legislators, the Southern Regional Education Board, the New England Board of Higher Education, and the Western Interstate Commission on Higher Education;

- Consider closer ties with the States in coordinating institutional and specialized accrediting activities; and

- Continue collaborating on issues of mutual interest, including but not limited to assessment measures, long distance learning and diploma mills.

Recommendation 5. *Encourage and promote more direct institutional involvement in the accrediting process, particularly by presidents and academic officers.*

It is unclear to what extent institutional and program officials understand the role and are adequately involved in the process of accreditation. In order to promote greater involvement:

- Accrediting bodies are encouraged to involve presidents on visiting teams and accrediting commissions; and

- COPA is encouraged to promote involvement by strengthening its avenues of communication with institutions and by appointing presidents to appropriate COPA governance units, task forces and standing committees.

Recommendation 6. *Improve the quality assessment and enhancement processes.*

Through such internal vehicles as professional development programs, liaison committees and task forces, and through the application of the principles guiding the recognition process, COPA should improve the purposes and processes of accreditation by:

- Promoting accreditation as a vehicle to encourage institutional integrity;

- Encouraging appropriate rigor in the evaluative process so as to increase public awareness and respect for the role of accreditation;

- Encouraging the elevation of accreditation from being defined as meeting minimal standards to encouragement of excellence;

- Similarly, heightening the expectations accrediting bodies have in relation to the recognition process;

- Encouraging accrediting bodies to emphasize the enhancement aspect of the accrediting process;

- Improving educational information storage and retrieval by improving access and updating the data base;

- Continuing to encourage accrediting bodies to adopt standards which are defined in terms of educational outcomes;

- Promoting the philosophy that, in order for self-regulation to work best, it needs to be inclusive in terms of who is involved; and

- Emphasizing that for the accrediting process to have maximum effectiveness, it must be an integral part of the program or institution's ongoing evaluative and planning processes.

Recommendation 7. *Encourage and promote increased sensitivity on the part of accrediting bodies, institutions and programs to the importance of assessing the impact of changing student clienteles on institutional and program missions, objectives and structures.*

It is not clear that adequate attention in considering institution or program effectiveness is being paid to the major increase in part-time and older students and the growing demand for professional and personal renewal. These students are present in varying degrees both in regular and in continuing education programs. Sufficient attention is not being paid to the fact that the increasing percentage of minorities in the general population is not reflected in the percentage of minorities attending postsecondary institutions. In order to promote more adequate and ongoing consideration of these issues:

- Accrediting bodies are encouraged to review and modify, as appropriate, standards relative to part-time students, adult and continuing education, and continuing education as a part of professional and personal renewal.

- Accrediting bodies are encouraged to insure that provisions for access to postsecondary education are not overlooked in the concern for quality improvement.

- Accrediting bodies are encouraged to include where appropriate persons knowledgeable in continuing education on visiting teams.

- COPA is encouraged to develop effective liaison between accrediting bodies and appropriate national organizations concerned with adult, part-time and continuing education to promote ongoing concern with the quality of such education.

- Consideration of the needs related to part-time students, continuing education, equity and access should be included on the agenda for any national conference on quality improvement sponsored by COPA and other national organizations.

Recommendation 8. *Enhance research and development efforts as they relate to accreditation issues of national significance.*

Matters of national significance which affect the nature of accreditation and its processes often require timely and current consideration and information collection in order that the total community affected by an issue (e.g., the role of outcomes measurement in accreditation) can be informed in a timely manner. To this end, COPA and its constituency are encouraged to:

- Identify issues of national significance affecting the nature of accreditation and its processes;
- Appoint task forces charged with considering issues in depth and reporting out in a brief period of time; and
- Disseminate the work of the task forces to appropriate parties.

(Please refer to the Appendix V for a detailed description of this research and development priority.)

IV. GOVERNANCE AND STRUCTURE

The Council was extensively restructured as a result of the report of the 1981 Self Study Advisory Panel. The current Self Study Advisory Panel believes that the changes made at that time have on the whole been beneficial and have made possible considerable progress by the Council over the past five years. This is evident not only from the record but from both oral and written testimony. Thus the Advisory Panel does not recommend a radical restructuring of the Council at this time.

There are, however, certain persistent problems in structure that need to be addressed and for which the Panel recommends changes or modifications. There are other items which might be described as continuing concerns which should be noted but that in the opinion of the Panel do not call for changes at this point. A number of what appear to be governance problems seem in fact to be attitudinal rather than structural. However, these must also be addressed.

The major areas of concern include the following:

- Representation on the Board and its committees;
- Adequacy of the current committee structure;
- Presidential involvement in accreditation in general and the Council in particular; and
- Assembly organization and effectiveness:
    a. Provision for meetings of subgroups with common and/or unique concerns within assemblies or across assemblies;
    b. Nonparallel character of the Assembly of National Postsecondary Educational Organizations (ANPEO) and how it can most effectively be constructed and utilized; and
    c. Effective communication among assemblies and of assemblies with the Board.

The Board

The current structure of the Board has a number of advantages. These include the following:

- It is large enough to represent the major academic, professional and public participants in the accrediting process but small enough to be workable as a committee of the whole without direct participation of specific interest groups.
- Because the members are elected by major segments of the community (the Assemblies) and not by specific organizations, they are able to participate in actions as Board members rather than as pledged delegates.

- Since all members of the Board except the public and ex officio members must hold responsible positions in accredited academic institutions, the character of the Board as representing the academic community is assured.

- Through the presence of the chairs of the three Assemblies on the Board, as well as the members of the Board directly elected by each Assembly, the Assemblies are assured that their concerns are communicated and seriously considered by the Board.

- The current structure assures effective representation of chief executive officers not only through election of representatives by ANPEO but also by the inclusion of the three chief executive officers elected at large. In addition, usually at least one president is elected as a representative of the Assembly of Institutional Accrediting Bodies.

While cognizant of the concern of the National Institutional Accrediting Bodies that as a minority in the Assembly of Institutional Accrediting Bodies (AIAB), the probability of election of a representative from that group to the Board by AIAB may be low, the Advisory Panel believes that designating specific or individual representative positions on the Board could lead to Board fragmentation. However, it would urge future nominating committees to give particular attention to including a president from a nationally institutionally accredited institution among the chief executive officers elected at large. This is in the spirit of the 1981 report, which suggested that one of the functions of the category of chief executive officers elected at large was to enable the Board to balance itself. The Panel would suggest that AIAB should consider balance in its representation on the Board. It would also urge the national institutional accrediting bodies to insure that appropriate persons from their institutions are brought to the attention of AIAB and are forwarded to the nominating committee for its consideration.

While the Advisory Panel does not propose any major changes in Board structure, it does recommend the following:

Recommendation 9. *To insure continuing presidential involvement, the panel recommends that the provision for three at-large members of the Board nominated by the Assemblies being "chief executive or chief academic officers" be changed to include only "chief executive officers."* It should be noted that in practice one or more members elected by AIAB to the Board is usually a current or past college president. Thus presidents in fact constitute a majority of the elected members of the Board. (See Appendix VI A)

Recommendation 10. *The ex officio members who currently are restricted to voting only on election of Board members should be given the right to vote on all matters before the Board (exception to this is the president of COPA).* (See Appendix VI A)

Board Committees:

The Panel reviewed the committee structure in terms of current practices and commitments and of future needs to carry out proposed objectives and priorities. As a result, the Panel proposes changing somewhat the makeup of the Executive Committee, formalizing the Professional Development Committee and the COPA-SHEEO Liaison Committee, establishing the Nominating Committee as a Standing Committee, and eliminating the Committee on the Public Interest. Proposed bylaw modifications reflecting these changes are provided in Appendix VI A.

With regard to the Recognition Committee, the Panel recognizes the desirability of having persons with presidential experience as members. However, it does not believe that a bylaw change is either necessary or called for since two members of the Recognition Committee must represent ANPEO and these are nominated by that Assembly. Accordingly, the Panel urges ANPEO to nominate persons with presidential experience for membership on the Recognition Committee.

Recommendation 11. Executive Committee: *The Executive Committee should be increased from four voting and one ex officio members to five voting and one ex officio members.*

The members of the Committee should include as at present the four officers of the Board and the secretary (who is President of the Council) plus one member from the Board elected by the Board for a two year term. This person should be elected on nomination by the Nominating Committee in the same year as the Chairman of the Recognition Committee is elected. The current Executive Committee concurs with this recommendation. This change would both increase the scope of the Committee and facilitate ease of meeting by providing a working quorum in case all members could not be present. It is suggested that at least two members of the Executive Committee be institutional chief executive officers. (See Appendix VI B.)

Recommendation 12. Nominating Committee: *The Panel recommends that the Nominating Committee be made a standing committee and that the bylaws be modified to reflect this.*

Currently the Nominating Committee is in effect an ad hoc committee appointed each year. The standing committee should include at least three persons appointed by the Chair of the Board. The Chair of the Nominating Committee shall be a member of the Board. Other members may be selected from outside Board membership. (See Appendix VI C.)

Recommendation 13. Professional Development Committee: *The Panel recommends that the Committee on Professional Development should be made a standing committee of the Council.*

This Committee should become a standing committee as evidence of commitment to the priority to provide professional services, to contribute to the professional development of accrediting body staff members and in keeping with the commitment of assisting in the improvement of the accrediting process.

The Committee shall consist of six members appointed by the Chair of the Board, two of whom shall be the vice chairs of AIAB and ASAB and who shall alternate as chairs of the committee. The other four members shall be appointed for two year terms. (See Appendix VI D.)

Recommendation 14. Committee on State Relations: *The Panel strongly recommends that steps be taken to constitute the current COPA/SHEEO Liaison Committee into a standing committee of both organizations. To accomplish this the Panel recommends that COPA establish a Standing Committee on State Relations to consist of five persons with staggered two-year terms authorized to meet separately if need be but also designated as the COPA half of a COPA/SHEEO Liaison Committee.*

The Panel noted positive outcomes which have been developed through COPA and state governmental relations initiatives. Activities with organizations of state officers, state regulatory agencies, and consultation with individual states have led to improved communication between the states and COPA. In order to reaffirm these relationships, recognize growing influence of the states in the improvement of quality of postsecondary education, and further strengthen the linkage between COPA and the states, a standing committee on State Relations should be established which would serve as the COPA half of a permanent COPA/SHEEO Liaison Committee. This committee would also have responsibility for helping to formulate COPA policy as it relates to states and to state agencies. COPA would encourage SHEEO to form a similar Committee on Accreditation. Together they would constitute the COPA/SHEEO Liaison Committee with the chair to be drawn from SHEEO and COPA in alternate years. In addition the Panel encourages COPA to include representatives of the states on any appropriate task force or ad hoc committee. (See Appendix VI E.)

Recommendation 15: Committee on the Public Interest: *The Advisory Panel recommends that this Committee be abolished and removed from the bylaws.*

The Standing Committee on the Public Interest has not met in the last four years and its originally envisaged function seems to be accomplished by public member participation on the Board and the Recognition Committee.

The Assemblies:

It seems clear that the more serious structural problems relate to the Assemblies. Their importance is evident. They form an integral part of the Council. They serve as a forum for discussion of common concerns by the Specialized Accrediting Bodies through ASAB and the Institutional Accrediting Bodies through AIAB. The situation is somewhat less clear with ANPEO although the institutions as represented through their national higher education organizations share many common concerns with ASAB and AIAB. All three Assemblies play a crucial part in the policy development process.

However, there are some problems indigenous to AIAB and considerably more serious problems indigenous to ANPEO.

Recommendation 16. *The Panel recommends that the subassemblies, as provided for in the bylaws (9:04), be reinstituted.*

In the 1982 reorganization, provision for meetings of subgroups of Assemblies was included. This was to make it possible for the regional accrediting bodies to continue to meet as a subassembly if they so desired. After 1982, however, the subassembly ceased to meet within the COPA structure and AIAB was continued as a single group. More recently it has become evident that there are continuing issues on which the regional accrediting bodies need to deliberate which are only of peripheral concern to the national institutional accrediting bodies. This has led to informal meetings of the regional directors apart from their COPA involvement. The Advisory Panel believes such meetings should be provided for and take place within the COPA framework and should have the advantage of COPA staff support.

The Panel suggests that the subassembly meetings take place at the time of the COPA semiannual meetings or separately as seems most feasible. The Panel further suggests that in addition to a subassembly meeting for the regional executive directors the national institutional executive directors be encouraged to meet as a subassembly also. Other specialized accrediting bodies that accredit wholly or predominately free-standing specialized institutions where they in effect serve as institutional as well as specialized accrediting bodies may be invited to join with the national institutional group when appropriate to deal with common issues. At this time these could include chiropractic, podiatry, osteopathy, and rabbinic and talmudic studies. Each subassembly could make recommendations to its parent assembly or assemblies and through these to the Board.

Recommendation 17. *The Advisory Panel recommends to the national postsecondary organizations who are members of ANPEO that they continue to urge serious involvement of their presidents and trustees in the activities of their own institutional and specialized accrediting bodies.*

Recommendation 18. *In the light of the different character of ANPEO and its general advisory and policy consideration responsibilities relating to postsecondary educational institutions, the Panel recommends that the name be changed to the Presidents' Policy Panel on Accreditation (PPPA). The Presidents' Policy Panel on Accreditation, as it does now, would elect members (3) to the Board, nominate members for the chief executive at large and the public members of the Board, and nominate members (presidents or persons with presidential experience) to the Recognition Committe. At the Spring or Annual Meeting of COPA, it would convene as a COPA Assembly. Its Fall meeting, however, would be held in conjunction with the American Council on Education meeting where it could serve as a forum for presidential and other association members to discuss accreditation issues for possible referal to the COPA Assemblies and Board agendas.*

ANPEO was created in 1982 to insure presidential and institutional involvement in COPA, not only through the institutional accrediting bodies but also through the primary national organizations to which the institutions belong. Its creation involved moving into the COPA structure what had been the Interassociation Presidents' Committee on Accreditation, a group of the staff

executives plus presidential or institutional representatives, the latter of whom were at that time members of the COPA Board. It was (as were the other assemblies) given considerable latitude to develop its own agenda and procedures. It has at times contributed substantially to the Council through developing a policy agenda. It has more recently experienced problems in attendance and agenda development and has even lost a member organization ostensibly on the grounds of fiscal stringency and inability to pay its dues.

It is critically important that the presidents and institutional officials through their national organizations be directly involved in the affairs of the Council, provide their continuing perspective to the Council's deliberations, and accept responsibility in the total self-regulatory structure of accreditation in this country.

The organizational membership and financial responsibilities of the newly renamed Presidents' Policy Panel on Accreditation would remain essentially the same. As does the present Assembly, it could expand its membership to include other organizations on its own initiative subject to Board approval. The constituent individual members would include a presidential or trustee representative plus the staff executive officer of each of the member national organizations.

The Presidents' Policy Panel on Accreditation would be represented at the Fall meeting of the Assemblies and COPA Board by its officers through participation in the meetings of the officers of the Assemblies. This would enable these officers to inform the meeting of PPPA at the ACE meeting of any recent developments.

Meeting Schedules:

The various Panel recommendations on governance and structure clearly have implications for calendar and meeting schedules. Accordingly, the Advisory Panel recommends the following calendar items for consideration:

Recommendation 19.

1. *COPA Board: Two meetings per year (Spring and Fall). The Spring meeting will be designated the Annual meeting.*

2. *Assemblies:*

   a. *All three assemblies (AIAB, ASAB, PPPA) will meet at the time of the Spring or Annual meeting of the Board.*
   b. *PPPA will hold a second meeting in conjunction with the ACE meeting in the fall.*
   c. *AIAB and ASAB will meet with the Board in the fall unless agenda items are not sufficiently pressing to require such a meeting.*
   d. *Each Assembly including PPPA will delegate to its officers the power to act on its behalf between Assembly meetings. This group plus the President and the Chairman of the Board will meet at the time of the Fall Board meeting to review policy statements and transact any business for the Assemblies.*

e. *The subassemblies may meet either at the time of the regular Assembly meetings (Spring or Annual meeting), at the Fall meeting of the Board, or at such other times and places as they may decide in cooperation with COPA staff.*

3. *Professional Development: The Professional Development program will be held in conjunction with the Annual meeting of the Board and Assemblies in the spring. Additional sessions as called for may be held in conjunction with the Fall Board meeting or regional meetings of accrediting body representatives.*

4. *Recognition Committee: Beginning in the spring, 1987 the Committee on Recognition will meet prior to the semiannual meetings. The intent is to move eventually to a six-month review cycle whereby the Committee on Recognition would meet midway between the Board meetings. This will allow the accrediting bodies under review to respond to the Committee on Recognition recommendations prior to Board action without undue delay such as that which occurs under the current cycle. The Panel approves of this separation of schedules and recommends its continuance.*

V. FINANCES

The issue of the method of financing COPA has been a matter of continuing discussion and concern since the formation of COPA in 1975. While no one has quite defined what would constitute an equitable dues structure, the question of equity continues to be raised. What does seem clear to the Panel is that regardless of the formula or way in which dues are collected, the ultimate source of by far the largest portion of the dues is the postsecondary educational institutions themselves.

Funds for COPA from the institutions come through at least three tracks. The first and largest track is through dues and fees paid to the institutional accrediting bodies. Currently approximately 65% of the dues come from this source—42% from the regionals and 23% from the national institutional accrediting bodies.

The second track is through the specialized accrediting bodies, which currently provide approximately 28% of the dues. Here, however, the picture is more complex. Some, perhaps the largest portion, of the funds come from postsecondary institutions via programs. However, a number of programs, particularly in health and health related fields, are located in other than postsecondary educational institutions, e.g., hospitals and health care centers. Further, in a number of fields major portions of the costs of accreditation are carried not by higher educational institutions but by professionals and practitioners in the field. Thus, for example, in six fields 100% of the costs of accreditation are supported by the sponsoring professional association or associations. In another five fields the professional associations carry 75% or more of the costs.

The third avenue or track of COPA dues is through the national higher educational organizations that are part of ANPEO. These funds constitute only approximately 9% of the dues but come as in the first track from institutions through their national organizations.

It is thus the institutions and programs who primarily support COPA and for whose benefit both accreditation and COPA exist. In future discussions of equity and responsibility this fact should be kept in sight.

The Panel seriously explored a series of alternatives for financing including direct institutional billing. It found that for the reasons cited by the ad hoc finance committee of 1982 such direct institutional assessment is no more feasible now than it was at that time.

These reasons include (1) the difficulty and costs of billing and collecting from all the accredited institutions in the United States, (2) the lack of sanctions by COPA in relation to institutions who refuse to pay, (3) the recognition that without sanctions (as was the case with the National Commission on Accrediting) a portion of the higher education community would provide a free ride to the non-paying institutions thus creating even greater inequities, (4) the inability to forecast income on a voluntary system of

payment, and (5) the fact that those programs not in higher education institutions would pay little, if any, of their share of the costs.

The Panel also considered the "parity plan" of 1980, whereby institutional and specialized accrediting bodies would contribute equal amounts (45% each) in dues to COPA. It found that this position was based on a series of assumptions for which the Panel could find no supporting evidence, for example, that the costs of accreditation nationally are equally divided between institutional and specialized accrediting bodies.

Other alternatives, such as developing an endowment or including a pro rata surcharge on institutional and program dues to accrediting bodies were also reviewed. Each had major problems or disadvantages.

While there appear to be problems with the current dues assessment system, on the whole it seems to work reasonably well. Although there have been a few accrediting bodies that have requested and been granted temporary adjustments with delayed full payment, apart from one national higher education organization there have been no defaults. Accordingly, the Panel does not believe that major revision in dues structure is necessary at this time.

Recommendation 20. *The Advisory Panel recommends that the current system of dues assessment be continued for the period ahead but that it be carefully monitored for possible modifications in the light of changing postsecondary education economic and academic conditions.*

The Advisory Panel, however, calls attention to two critically important aspects of the system that relate to the perceived integrity of the Council on the one hand and to operational balance on the other.

Recommendation 21. *Given the present dues structure the Panel strongly recommends that the Board continue its policy in relation to invested funds and use of earnings on interest as it relates to the general fund balance.* This calls for maintaining a general fund balance of not less than 50% nor more than 100% of the fiscal year operating budget. Only by continuing such a policy can the Council's autonomy in reaching objective decisions in the recognition process in relation particularly to those member accrediting bodies with proportionately larger dues be preserved and defended. In addition as a matter of sound fiscal policy such a general fund balance provides an important protection against other financial crises.

The Panel suggests that realistically the current formula for proportionate amounts of dues--whereby institutional accrediting bodies are expected to pay 60%, specialized accrediting bodies 30% and national postsecondary organizations 10%--may have to be considered a guideline and not a fixed formula. As has happened within the last two years, the shift of an accrediting body from ASAB to AIAB or the withdrawal, loss, or gaining recognition can and does shift the proportionate amounts of dues paid by Assemblies or sectors.

VI. A POSTSCRIPT FOR THE FUTURE

In the preceding pages we have stated our views and recommendations on the current system of accreditation and the workings of the Council on Postsecondary Accreditation. That, in a formal sense, discharges our narrower responsibility to answer the questions we were asked to address as a self-study Panel taking an "internal" look at the current machinery of accreditation. Indeed, virtually all of us on the Panel are, one way or another, higher education "insiders," and therefore both advantaged and disadvantaged as persons who understand the workings, the complexities, and the politics that are the environment within which the system of accreditation of higher education operates in 1986.

We make no apology for our perspectives and backgrounds; indeed, we hope they have been useful in our assignment. But we feel compelled to add a postscript to our deliberations that speaks to the future. Our compulsion is motivated by our deep commitment to seeing American higher education improve to meet the tough challenges of the future. And this improvement, we are convinced, can and must be linked to the future role of accreditation in our system of postsecondary education.

Because we have some understanding of the complexities and workings of accreditation, we appreciate--and hope all concerned citizens appreciate--the difficult and time-consuming nature of the process of accreditation. It is a complicated and important endeavor. It is also an endeavor that faces new and demanding challenges, for American higher education is faced with an insistent national challenge to improve its quality while retaining its historic commitment to access and openness.

We are convinced that our American system of voluntary accreditation must work creatively to handle additional burdens and responsibilities within our system of higher education. As specific accreditation issues are faced, and as the various reports analyzing and prescribing for American higher education come and go, we expect that the Council on Postsecondary Accreditation will continue to go about its work. Its work has been, and will continue to be, useful in many practical and often unpublicized ways.

But we believe that the future agenda for the Council on Postsecondary Accreditation and the accreditation and higher education community must be a bolder one, one that speaks to the large public questions involving the challenges of improved quality and performance in our colleges and universities. We believe that all of the leading participants in the processes of accreditation, in our national higher education associations, and in our colleges and universities must work together to strengthen the quality of our teaching programs by making accreditation a vehicle for educational improvement.

Our postscript for the future, therefore, is that the role and mission of the Council on Postsecondary Accreditation must now begin to change. It should increasingly focus, in intimate collaboration with the nation's accrediting agencies and its colleges and universities, on stimulating dialogue and providing the kind of leadership that can make accreditation a positive instrument for assuring the quality education essential to our nation's future.

Respectfully submitted,

C. Peter Magrath, Chair
Paul Albrecht
E.K. Fretwell, Jr.
Ann Ida Gannon, BDM
Robert Glidden
John Rhodes Haverty
Paul C. Reinert, SJ
Arliss Roaden
Robert W. Scott

APPENDICES

I. Persons Submitting Written Testimony

II. Summary of Written Testimony

III. Speakers List: Oral Testimony

IV. Summary of Oral Testimony

V. Research and Development in Accreditation (Background for Recommendation 8).

VI. Suggested Changes in Articles of Incorporation and Bylaws

- A. General
- B. Executive Committee
- C. Nominating Committee
- D. Committee on Professional Development
- E. Committee on State Relations

VII. Acronyms

APPENDIX I

Persons Submitting Written Testimony
to the Self-Study Advisory Panel

1. Kay J. Andersen, Executive Director, Accrediting Commission for Senior Colleges and Universities, Western Association of Schools and Colleges
2. Robert H. Atwell, President, American Council on Education, Chair, Association of National Postsecondary Educational Organizations
3. Charles J. Austin, President, East Texas State University, Member, Assembly of National Postsecondary Educational Organizations representing the American Association of State Colleges and Universities
4. Nancy R. Axelrod, Vice President for Programs in Public Policy and Samuel Silverman, Former Chairman, Association of Governing Boards of Universities and Colleges, Assembly of National Postsecondary Educational Organizations
5. James Ballowe, Chair, Commission on Institutions of Higher Education, North Central Association of Colleges and Schools
6. Randall Bell, Executive Director, American Association of Bible Colleges, Secretary, Assembly of Institutional Accrediting Bodies
7. W. Lee Burge, Chairman, Equifax, Inc., Public member, COPA Board
8. J. Douglas Conner, Executive Director, American Association of Collegiate Registrars and Admissions Officers
9. L. M. Detmer, Secretary, Joint Review Committee on Educational Programs for Physician Assistants (CAHEA)
10. Mildred J. Engle, Vice President/Academic Dean, Pennsylvania College of Straight Chiropractic, President, Straight Chiropractic Academic Standards Association
11. John J. Fauser, Director, Division of Allied Health Education and Accreditation, American Medical Association (CAHEA)
12. Bernard Fryshman, Executive Director, Accreditation Commission, Association of Advanced Rabbinical and Talmudic Schools
13. Samuel Hope, Executive Director, National Association of Schools of Music and National Association of Schools of Art and Design
14. William K. Laidlaw, Executive Vice President, American Assocation of Collegiate Schools of Business, Chair, Assembly of Specialized Accrediting Bodies
15. Paul D. Nelson, Director, Office of Accreditation, American Psychological Association
16. Dale Parnell, President, American Association of Community and Junior Colleges
17. Robert M. O'Neil, President, University of Virginia, Member, COPA Board
18. Allan W. Ostar, President, American Association of State Colleges and Universities, Member, Assembly of National Postsecondary Educational Organizations
19. James. T. Rogers, Executive Director, Commission on Colleges, Southern Association of Colleges and Schools
20. J. R. Schofield, Secretary, Liaison Committee on Medical Education, Association of American Medical Colleges

APPENDIX II

Summary of Written Testimonials
for the COPA Self-Study Advisory Panel

POSITIVE OBSERVATIONS

In written testimony, a number of factors were mentioned as specific strengths of COPA. The professional staff was seen to be particularly effective in carrying out the objectives which emerged from the previous self-study. For instance, service to accrediting bodies in the form of professional development, guidance in the recognition process, and support services regarding accreditation were cited. Research and the development of policy papers, preparing publications, and information dissemination were noted as well as the professional staff role in promoting and maintaining positive federal governmental relations. Other favorable notices not as frequently mentioned included the appropriateness of the structure of COPA, the providing of a forum for discussion of diverse viewpoints, and the seeking of external funding for projects.

ISSUES, AREAS OF CONCERN, AND SUGGESTIONS FOR IMPROVEMENT

Most writers noted that COPA has been successful in meeting its objectives especially in the past five years but offered suggestions for further improvements. In some cases specific recommendations were made, and in other instances topics to be addressed by the panel were identified. The major topics were finance, governance and structure, and policies, priorities, and objectives.

Finance

The most frequently mentioned concern about finance related to perceived inequities in the dues structure. It was suggested that dues be equalized and that dues assessments be related to benefits, i.e., provide more services to higher dues paying members (Andersen). Charging annual fees directly to institutions (Atwell) was another suggestion as well as seeking external funding for special tasks or projects and for building a permanent endowment (Ballowe). One person stated that while he did not oppose, he had reservations about building a reserve fund of over 50% of the annual budget (Atwell).

Regarding expenditures, the following recommendations were made: reduce expenditures (Burge); include only modest inflationary cost adjustments in projected expenditures (Schofield); limit services to monitoring and publications (Rogers); consider adjusting size and type of COPA staff (Andersen); limit Board meetings to one per year held in Washington in alternating years (Schofield); use teleconferencing to conduct executive committee business (Schofield); and avoid duplication of work of the assemblies (Schofield).

An area identified as an excessive expenditure for accrediting bodies was the cost of five-year reviews. It was suggested, instead, that after initial recognition, the accrediting bodies be evaluated every ten years for continuing accreditation with an annual two-page report to be submitted for monitoring purposes (Schofield).

Except for the dues issue, each item was mentioned once.

Governance and structure

A sense of dissatisfaction with the current structure was found in a number of the testimonials. Such concerns focused on insufficient communication among assemblies. There was also, particularly from ANPEO representatives, a concern about the need for increased participation of institutional presidents. Though specifics were not given, suggested changes included revising the meeting format (Laidlaw), creating a new governance structure (Rogers), promoting better understanding among the Assemblies (Axelrod and Silberman), nominating presidents to represent ANPEO on the Committee on Recognition (Austin), assuring presidential control of the Board (Atwell), and developing a means to ensure representation of national institutional accrediting agencies on appropriate decision making bodies (Bell). The intent of these changes is to provide a forum for sharing common problems and interests, to develop more effective linkages among the assemblies, to reduce overlaps (Axelrod and Silberman), and to bring a more university-wide perspective to specialized accreditation (Austin). It was also suggested that the Assemblies meet once a year to discuss business related to the Board and meet separately if additional meetings are necessary (Andersen). To "ensure a national accrediting system that uses regional agencies," it was suggested that staff assignments be revised to provide more service to the regionals in the formulation of common policy positions (Ballowe).

Policies, priorities, and objectives

The perceived roles and functions of COPA have a direct influence on the substance of the written testimonies in relation to the development of policies, priorities, and objectives. It was stated that COPA should continue to influence deeper thinking about accreditation, monitor the federal government on issues of accreditation, and disseminate information about accreditation. The following suggestions, both general and specific, were made related to the COPA roles (1) as the developer of national accreditation policy, (2) as the monitor of accreditation issues, and (3) as the national voice for accreditation.

- Influencing accreditation—COPA should focus primarily on quality improvement and outcomes (Burge); it should continue to provide a forum where accrediting bodies can share information (Burge); COPA should be supported as the appropriate vehicle for recognition (Rogers); opportunities should be provided for input in developing policies which may affect the accreditation community (Rogers); flexibility should be encouraged to support the needs of special projects (Andersen) such as evaluation of education programs at military installations and accreditation of foreign institutions; COPA should move to promote accreditation as a stimulus for improvement (Ballowe); it should facilitate research on accreditation (Schofield) and devise a program to communicate the values of accreditation to leaders of society and the public (Schofield); COPA should assume a more substantive role in addressing troublesome issues such as the prescriptive nature of some curriculum standards (O'Neil); COPA should lead in the development of national policies and strengthen its relationship with the federal government (O'Neil); and it should attend to institutional quality issues working toward comparable standards within and across regional lines (Atwell) and stem the proliferation of accrediting bodies (Laidlaw).

- Monitoring—COPA should continue to observe activities of the federal and state governments with particular attention (1) to the Division of Eligibility and Agency Evaluation, (2) to proposed legislation, and (3) to new regulations (Schofield); COPA should restrict the overlap of jurisdictions among accrediting bodies (Laidlaw); COPA should include the monitoring function in its stated objectives, providing information that may affect the accrediting community and providing opportunities for input into these developments (Rogers).

- Disseminating information—COPA should provide information through publications and newsletters and disseminate information on legislation and research on accreditation (Rogers); COPA should promote information exchange and speak to the issue of defending the autonomy of accreditation processes and defending the institutions against encroachment by the government or other bodies outside the voluntary accreditation community (Rogers).

Other comments of a general nature addressed the formulation of clear, sharply focused objectives (Anderson), policies to encourage regional accrediting bodies to apply their standards rigorously especially for initial accreditation (Laidlaw), and means by which problems identified by presidents could be resolved, the recognition of institutional diversity, for example (Atwell). Specific suggestions to the panel included using a survey in the self-study process (Anderson), building assembly agendas which allow for the annual discussion of priorities (Fryshman), changing recognition cycles (Anderson), and allowing variance in meeting recognition provisions depending on the size and type of accrediting agency (Detmer).

APPENDIX III

Speakers List
Public Hearings
COPA Self-Study Advisory Panel
June 30 - July 1, 1986

Mildred J. Engle, President, Straight Chiropractic Academic Standards Association (SCASA)

Hoke L. Smith, President, Towson State University, Chair, American Association of State Colleges and Universities (AASCU)

C. Ronald Kimberling, Assistant Secretary for Postsecondary Education, U.S. Department of Education

Gordon K. Davies, Director, State Council of Higher Education, Virginia, State Higher Education Executive Officers (SHEEO)

James M. Phillips (Vice Chair, AIAB), Executive Director, Association of Independent Colleges and Schools (AICS)

William K. Laidlaw (Chair, ASAB and Member Ex Officio, COPA Board), Executive Vice President, American Assembly of Collegiate Schools of Business (AACSB)

Robert Kirkwood (Chair, AIAB and Member Ex Officio, COPA Board), Executive Director, Commission on Higher Education, Middle States Association of Colleges and Schools

Jeannette Taylor, Chair, Committee Liaison for Accreditation and Standards in Continuing Education (CLASCE), National University Continuing Education Association (NUCEA), Dean, Division of Continuing Education, University of Cincinnati

Hilton T. Bonniwell, President, National University Continuing Education Association (NUCEA)

Robert M. O'Neil (Member At-Large, COPA Board), President, University of Virginia

APPENDIX IV

Summary of Oral Testimony for the COPA Self-Study Advisory Panel

Mildred J. Engle, President, Straight Chiropractic Academic Standards Association (SCASA)

Dr. Engle's testimony centered on the assumptions that (1) COPA does not adhere to its own guidelines in recognition matters, (2) COPA has not developed a procedure for hearing complaints, and (3) COPA does not have a mechanism to ensure that its guidelines are monitored. Specifically, Dr. Engle made reference to the Council on Chiropractic Education and her belief that the accrediting body does not embrace the full community of interests since it does not include the straight chiropractic profession within its scope. She suggested that COPA appoint a special internal review panel to deal with claims against accrediting bodies.

Hoke L. Smith, President, Towson State University, Chair, American Association of State Colleges and Universities (AASCU)

Dr. Smith spoke to the value of accreditation in the preservation of decentralization of control and intellectual freedom. He suggested several priority issues to which COPA should address itself: (1) the institutional accrediting process by the regional associations should be strengthened in the area of qualitative evaluation, ie., institutional evaluation should take into account the full range of educational goals as defined by the institution, and accrediting bodies should assess the institution's assessment system in relation to its goals; (2) the nature of the accreditation process is developmental, and results of reports should not be selectively released; rather, some method should be developed to address the public interest while the developmental character of accreditation is maintained; (3) efforts to standardize the data base are to be applauded as a means of simplifying the self-study process; (4) in an effort to control costs, efforts should be made by the accrediting bodies to hold to a reasonable team size; (5) specialized accrediting bodies should be encouraged to protect institutional integrity and balance and restrain self-serving tendencies; (6) specialized accrediting bodies should recognize differences between research institutions and state supported colleges and universities in terms of autonomy, salaries, and working conditions and take these differences into consideration; (7) since it is difficult for the general administration or general faculty to control a specialized accrediting body, an oversight function could be developed to allow generalists to comment on standards and the implication of these standards on the institutions.

Dr. Smith referred to written testimony submitted by Allan Ostar, president of AASCU, which he supported. Key elements of Dr. Ostar's paper refer to the continued support of AASCU for COPA and a call for COPA to strengthen its efforts in these ways: continue to challenge overly specific quantitative standards; assure that accrediting bodies focus on effectiveness, results, and outcomes; help encourage institutional freedom and autonomy; prevent the recognition of unnecessary or duplicative accrediting bodies; encourage the

relevance of the arts and sciences to professional education; ensure that accrediting bodies are not misused to promote special interests; strengthen the role of accreditation in relation to state concerns about educational quality; and clarify with the states the relationships among accreditation, licensure, and certification.

C. Ronald Kimberling, Assistant Secretary for Postsecondary Education, U.S. Department of Education

After describing the development of the Division of Eligibility and Agency Evaluation, its role of quality assurance, and its relationship with non-regulatory accrediting bodies, Dr. Kimberling emphasized the need for demonstrable and measurable indicators of quality, consumerist concerns, and public scrutiny of higher education, particularly graduate schools serving foreign students that provide education as a major export product. He stressed the need for student outcome measures, revision of accreditation criteria, and consistency of treatment of an institution among accrediting bodies, that is, promoting reciprocity among peers. Regarding the assessment of quality in the non-traditional delivery of graduate education, Dr. Kimberling suggested that consideration be given to the efficacy of using part-time faculty, the measurement of student outcomes through proficiency standards, the use of institutional resources, means for collecting and disseminating information, and the use of joint reviews and recognition where possible.

Gordon K. Davies, Director, State Council of Higher Education for Virginia, State Higher Education Executive Officers (SHEEO)

Dr. Davies suggested ways that accrediting bodies could be allies of state higher education agencies in planning and coordination. For instance, in response to the push by governors and legislatures, accrediting bodies could join with state higher education agencies in defining appropriate criteria for student assessment, in documenting needs for equipment and maintenance, in limiting degree escalation and degree inflation, in coordinating accreditation activities among various bodies to reduce the number of visits and related costs, and in anticipating new opportunities, issues, problems and solutions in the accrediting community. In the discussion following testimony, interest was expressed by panel members in developing a COPA policy statement advocating greater state higher education agency involvement in accreditation activities and identifying areas to be considered for cooperation including, perhaps, the coordination of licensure of institutions and the appropriate use of veterans benefits.

James M. Phillips (Vice Chair, AIAB), Executive Director, Association of Independent Colleges and Schools (AICS)

Recommendations to the panel made by Dr. Phillips were suggestions to strengthen the intent of COPA's stated objectives. For instance, he recommended that since there will be a greater need for strong COPA-governmental relations, as a spokesperson for accreditation, COPA should include within this objective relations at the state level as well as the

federal level. Relative to this role, COPA should be empowered to speak for all accrediting bodies when current legislative developments require an accreditation position. A second recommendation revolved around the need to improve coordination and cooperation among COPA constituencies. This would require a change of structure to assure that the Board includes representation of private, independent institutional accrediting bodies. Another related matter is the coordination of dues collection in those cases where an institution is accredited by more than one body. Regarding the service to the broader interests of the educational community and society, Dr. Phillips suggested that the panel instruct COPA to insist strongly that its affiliated accrediting bodies pay greater attention to student consumer protection at the institutions they accredit.

William K. Laidlaw (Chair, ASAB and Member Ex Officio, COPA Board), Executive Vice President, American Assembly of Collegiate Schools of Business (AACSB)

In his testimony, Dr. Laidlaw addressed difficulties of long duration within COPA which deserve attention from the panel. The proliferation of accrediting bodies leads to problems of overlapping jurisdiction which may inadvertently encourage institutions to seek accreditation from bodies offering the "path of least resistance." In order to emphasize educational effectiveness, regional accrediting bodies should be discouraged from accrediting institutions of marginal quality. This problem, left unchecked, could lead governmental agencies to assume greater influence over accreditation. Greater attention should be given to the development of outcome measures, that is, instruments to assess knowledge of skills to be retained and measures of attitudes relative to the profession. COPA should work to create environments conducive to the use of outcome measures to evaluate results of educational programs. Lastly, a meeting format should be devised to improve communication by providing sufficient opportunities for interchange between representatives of the assemblies.

Robert Kirkwood (Chair, AIAB and Member Ex Officio, COPA Board), Executive Director, Commission on Higher Education, Middle States Association of Colleges and Schools

Dr. Kirkwood addressed as a persistent problem the lack of understanding and awareness of accreditation both inside and outside educational institutions. He suggested that COPA should be communicating about the diversity which characterizes American higher education, the importance of self-regulation, and the primary interest of accreditation in institutional improvement. Dr. Kirkwood suggested several areas for improvement of COPA which should be considered by the panel: the meeting schedule should be modified to foster improved communication for those accrediting bodies with common interests and concerns and among the Assemblies; a reassessment of funding of COPA should be considered with the intent of developing a more equitable funding formula; the question of common and uncommon interests of the AIAB should be considered along with a plan to permit meetings of accrediting bodies in subgroups; and the recognition cycle should be reconsidered, perhaps a ten-year cycle with an interim report in the fifth year. Regarding the influence of COPA, Dr. Kirkwood expressed a desire for steadily rising expectations and a need to keep accreditation current and on the cutting edge of educational improvement.

Jeannette Taylor, Chair, Committee Liaison for Accreditation and Standards in Continuing Education (CLASCE), National University Continuing Education Association (NUCEA), Dean, Division of Continuing Education, University of Cincinnati

Dr. Taylor introduced NUCEA president Hilton T. Bonniwell who testified on behalf of NUCEA. He expressed a concern over the lack of attention to quality issues relative to continuing education in the overall evaluation and accreditation of postsecondary institutions. Dr. Bonniwell's concerns arise from the rapid growth of continuing education, the increase in numbers of part-time students, the greater age range of postsecondary students, and increasing need for consumer protection. He stated that at the present time there is inadequate review of continuing education, and in many cases institutional accreditation does not assure the presence of quality of continuing education in that this area is not reviewed carefully, and the relationships between continuing education and other programs within the institution are not adequately evaluated. He urged the panel members to consider four recommendations to improve regional and specialized accreditation on behalf of continuing education: (1) establish a task force to develop common standards on continuing education that could be adopted by both regional and specialized accrediting bodies; (2) support the development of an adequate pool of evaluators to use newly developed standards; (3) devote increased attention to new formats and educational delivery systems; (4) examine the growth of continuing education in response to increased demands from business and industry. If these recommendations are adopted by COPA, NUCEA pledges its full support and assistance in carrying them out.

Robert M. O'Neil (Member At-Large, COPA Board), President, University of Virginia

In his testimony Tuesday morning, Dr. O'Neil offered several observations about COPA which he believes to be pertinent to the work of the panel.

1. Accreditation is at the core of the institutions' claims of credibility as reflected in their ability to assess and regulate themselves.
2. Accreditation must be coordinated at the national level particularly in relation to the role of the federal government in the accrediting process; and of great importance is the establishment of a single set of national standards and norms for institutional accreditation. Thus, if there were no COPA, something like it would have to be invented.
3. The balance of power among the constituencies of COPA is a legitimate concern. Modifications of the structure to provide a greater voice for some groups might be warranted. Perhaps liaison groups could improve communication among the Assemblies. Regarding the voice of the presidents, the problem may lie as much with under-involvement as with under-representation. Perhaps a crisis in accreditation of the magnitude of the crisis in intercollegiate athletics is necessary to force presidents to focus the time and energy needed for change.
4. The potential for COPA's role in accreditation has not yet been fully tapped; COPA could assume a more substantive role in its standards of recognition. Perhaps, for example, more attention can be given to the baccalaureate curriculum and to the assurance of academic freedom and affirmative action.

5. The development of national policies which supplement the review and recognition process is an indispensable role of COPA. Relationships with the federal government and with accrediting bodies provides a vital link for information exchange.

In response to questions from the panel, Dr. O'Neil suggested that instead of national standards there could be comparability in addressing various topics, for example, the assessment of institutions offering instruction in regions other than their own. Regarding student outcomes assessments, Dr. O'Neil perceived this as important to establish accountability but not to prescribe instruments or acceptable scores. A panel member suggested a conference or task force on outcomes, their appropriate measures, and what outcomes assessment can and cannot do which might involve representatives of COPA, Educational Testing Service (ETS), and SHEEO. In response to a question about presidential involvement, Dr. O'Neil suggested task forces, an advisory group of presidents, scheduling the ANPEO meeting at the ACE meeting, recognition activities, and evaluation responsibilities; he suggested that retired presidents might be able to contribute more time.

APPENDIX V

Research and Development in Accreditation
(Background Material for Recommendation 8)

To advance the state of the art in accreditation, COPA should initiate and provide leadership and administrative support to a Research and Development function drawing on resources, skills, and tested practices in the accrediting community for the solution of problems which cut across institutional and specialized accreditation boundaries. This endeavor should be conducted for a three-year experimental period and then reviewed. One possible format is the following.

A small set of Task Forces, perhaps two, should be formed each year to function for a year. Each Task Force should be directed to a specific topic and should develop a report at the conclusion of that year to be shared with the entire accrediting community. For illustration, topics such as: (1) an assessment and review of outcome measures as indicators of quality in accreditation assessment, or (2) a review of the proper role of standards in the accreditation process. The purpose of each Task Force would be to define the problem in the stated area and to assess and/or develop some alternative solutions. Its purpose would be to do the research and development labor required of an in-depth analysis. It's purpose should in no sense be to attempt to legislate or mandate. COPA would act as initiator, legitimator and "honest broker."

Membership

The membership of the Task Forces would come largely from the regular accreditation community, staff and "volunteers," with an occasional technical expert added. Some special staff support should be provided to each specific Task Force either from COPA or one or the other of the associations.

Task Force Topics

The proposed COPA/ACE conference on accreditation might have as one of its outcomes the designation of such study areas. Conversely, it might receive such reports. Suggested topics for the first year for purposes of illustration might be the following:

1. An assessment and review of outcome measures as indicators of quality in accreditation assessment. This may be the principal technical issue of the 80's. The accreditation community should quickly assume a proactive position on this matter. It should review technical, feasibility, and political aspects of outcome measurement from the standpoint of highly knowledgeable accreditors and provide assessment and recommendations to the entire accreditation community. The latter can then use these findings as it sees fit through its normal mechanisms of deliberation and decision.

2. A review of the proper role of standards in the accreditation process, including in particular issues of optimal specificity, commonality across the span of institutional and specialized accreditation, and the possibility of developing selected core national standards for institutional accreditation.

3. Other possible areas for common research and development attention include such matters as (a) the possible simplification and coordination of the self-study and review process in colleges and universities by institutional and specialized agencies, (b) the relative emphasis on general vs. specialized education in undergraduate study, (c) the assessment of methods for informing institutions and the public about accreditation, and (d) the training and evaluation of accreditors.

Financial Support:

When such a "Research and Development" function is mentioned, the issue of cost arises immediately. Often fund-raising is mentioned as a possible strategy for financial support. While such an approach is possible, it tends to be cumbersome and uncertain. Furthermore, undue delay is almost inevitable. Financial support should rather be provided in the following manner: COPA should re-direct some time and energy to being the "honest broker" and provide some special Task Force staff support; other accrediting bodies might provide Task Force staff support as well; Task Force members either from agencies or universities and colleges should donate their time; the agencies or universities and colleges from which the individual Task Force members came should provide travel expense support; COPA should prepare and duplicate the report. These support mechanisms may involve a somewhat different approach; they seem feasible enough to merit a try. Much is at stake for the entire accreditation community including its college and university members.

APPENDIX VI

Suggested Changes in Articles of Incorporation and Bylaws Language

A. General

If recommendations of the panel are adopted by the Board, a number of changes in the Articles of Incorporation and the Bylaws will be necessary. Places where those changes will occur are cited below.

Page Number	Proposed Change or Addition
Articles of Amendment to the Articles of Incorporation	
New pages following page 6	Add amendments to Article THIRD Purposes and Article FOURTH Members.
Bylaws	
4 and 5	Revise Article II, Purposes.
5, 6, 8, 9, 19, 20	Change name of Assembly of National Postsecondary Educational Organizations.
8	Delete or chief academic officers.
13	Change fall to spring, item 1 and revise language.
14	Change voting rights for ex officio members.
15	Change Section 6:01 to reflect new composition of Executive Committee.
17 and 18	Delete Article VII, Sections 7:01-7:05, Committee on the Public Interest.
Following page 20	Add new language and Articles creating three standing committees - the Nominating Committee, the Committee on State Relations, and the Committee on Professional Development. Change the numbers of subsequent Article.
22	Add new item, the power to delegate to its officers.
25	Revise Section 9:04, Meetings, item 1 -- change fall to spring, add statements relative to fall meetings.
25	Add to Section 9:04, Officers Meetings, new item 4.
26	Change item 4 to item 5.

B. Executive Committee

ARTICLE VI
Executive Committee

Sec. 6:01. Membership, Election, and Terms of Office.

There shall be an Executive Committee of the Board composed of six members to include the Chairman of the Board, Chairman-Elect in election years, Past Chairman in alternate years, Treasurer, Chairman of the Committee on Recognition, and a Member At-Large, each as voting members, and the Secretary as a non-voting member. The Chairman, Chairman-Elect, Past Chairman, and Treasurer shall serve concurrently with the terms of their respective offices. The Chairman of the Committee on Recognition and the Member At-Large shall be elected in the same year for two year terms from among the members of the Board. The Secretary shall be the President of the Council.

C. Nominating Committee

ARTICLE VII
Nominating Committee

Sec. .01. Membership, Appointment, and Terms of Office.
There shall be a Nominating Committee composed of at least three members, appointed by the Chairman of the Board. The Chairman of the Committee shall be a member of the Board; other members may be selected from outside Board membership. The Chairman and other members of the Nominating Committee shall serve for one year and shall be eligible for reappointment. They shall take office on July 1 following their appointment.

Sec. .02. Duties.
The Nominating Committee shall have responsibility for selecting and placing before the Board for election persons qualified for the following positions:

Board members from among chief executive officers of accredited institutions;
Board members to represent the public;
Officers of the Board, including chairman-elect, treasurer, and member at-large of the Executive Committee;
Members of the Committee on Recognition; and
Chairman of the Committee on Recognition.

Sec. .03. Meetings.
The Nominating Committee shall meet at least annually and at other times as may be necessary.

Sec. .04. Reporting.
The Nominating Committee shall report to the Board annually at the Annual Meeting or at any other meeting during which elections are to be held.

Sec. .05. Compensation.
Members of the Nominating Committee shall receive no compensation for their services but shall be reimbursed for travel and other necessary expenses incurred in fulfilling their duties as Committee members.

D. Committee on Professional Development

New ARTICLE VIII
Committee on Professional Development

Sec. :01. Membership, Appointment and Terms of Office.

There shall be a six member Professional Development Committee composed of the Vice Chairs of the Assembly of Institutional Accrediting Bodies and the Assembly of Specialized Accrediting Bodies, and two representatives of the Assembly of Specialized Accrediting Bodies, one of the Assembly of Institutional Accrediting Bodies and one of the President's Policy Panel on Accreditation appointed by the Chairman of the Board. The Chair shall rotate annually between the Vice Chairs of the Assembly of Institutional Accrediting Bodies and the Assembly of Specialized Accrediting Bodies. Members of the Committee shall serve for two years and shall be eligible for reappointment for one additional term. They shall take office on July 1 following their appointment.

Sec. :02. Duties.

The Professional Development Committee shall be responsible for the general planning of those activities which will enhance the development of accreditation association staff. The Committee shall advise the Board on matters of professional development and shall be responsible for specific duties assigned by the Board.

Sec. :03. Meetings.

The Professional Development Committee shall meet at least semiannually and at such other times as may become necessary.

Sec. :04. Reporting.

The Professional Development Committee shall report to the Board at each of the Board's annual meetings and at other regular or special Board meetings as may become necessary.

Sec. :05. Compensation.

Members of the Professional Development Committee shall receive no compensation for their services but shall be reimbursed for travel and other necessary expenses incurred in fulfilling their duties as Committee members.

E. Committee on State Relations

New ARTICLE IX
Committee on State Relations

Sec. :01. Membership, Appointments, and Terms of Office.

There shall be a Committee on State Relations composed of five members appointed by the Chairman of the Board. Members of the Committee shall serve staggered two-year terms and shall be eligible for reappointment to one additional term. They shall take office on July 1 following their appointment.

Sec. :02. Duties.

The Committee on State Relations shall serve in an advisory capacity to the Board, and in this role it may recommend items for the agenda of the Board or the Executive Committee. The Committee shall be responsible for helping to formulate the Council on Postsecondary Accreditation policy as it relates to states and to state agencies. It shall serve when and if appropriate as the Council on Postsecondary Accreditation constituency of a joint Council on Postsecondary Accreditation/State Higher Education Executive Officers Liaison Committee, to address common interests of both the Council on Postsecondary Accreditation and the State Higher Education Executive Officers including, but not limited to, issues related to quality improvement and enhancement of postsecondary education.

Sec. :03. Meetings.

The Committee on State Relations shall meet at least annually and as may become necessary. A majority of the membership of the committee shall constitute a quorum. The Committee shall also meet at least annually and as may become necessary with the State Higher Education Executive Officers constituency of a joint liaison committee.

Sec. :04. Reporting.

The Committee on State Relations shall report to the Board at each of the Board's annual meetings and at other regular or special Board meetings as may become necessary.

Sec. :05. Compensation.

Except for the President, Committee members shall receive no compensation for their services, but shall be reimbursed for travel and other necessary expenses incurred in fulfilling their duties as Committee members.

APPENDIX VII

Glossary of Acronyms Used

Constituent Units:

COPA	Council on Postsecondary Accreditation
AIAB	Assembly of Institutional Accrediting Bodies
ANPEO	Assembly of National Postsecondary Educational Organizations
ASAB	Assembly of Specialized Accrediting Bodies
PPPA	Presidents' Policy Panel on Accreditation

National Organizations:

AACSB	American Assembly of Collegiate Schools of Business
AASCU	American Association of State Colleges and Universities
ACE	American Council on Education
AICS	Association of Independent Colleges and Schools
CAHEA	Committee on Allied Health Education and Accreditation
CLASCE	Committee on Liaison for Accreditation and Standards in Continuing Education
ETS	Educational Testing Service
NUCEA	National University Continuing Education Association
SCASA	Straight Chiropractic Academic Standards Association
SHEEO	State Higher Education Executive Officers Association

ARTICLES OF INCORPORATION OF COUNCIL ON POSTSECONDARY ACCREDITATION, INC.

TO: Recorder of Deeds, D.C.
Washington, D.C.

We, the undersigned natural persons of the age of twenty-one years or more, acting as incorporators of a corporation adopt the following Articles of Incorporation for such cooperation pursuant to the District of Columbia Non-Profit Corporation Act:

FIRST: Name. The name of the corporation is "Council on Postsecondary Accreditation, Inc." (hereinafter called the Council or the Corporation).

SECOND: Period. The period of duration is perpetual.

THIRD: Purposes. This corporation is organized under the District of Columbia Non-Profit Corporation Act and shall be operated as a non-profit corporation exclusively for educational, scientific, research, mutual improvement, and professional purposes as follows:

(a) To promote the improvement of postsecondary education, principally through the process of accreditation and such other means as it shall devise;

(b) To review continuously the accrediting practices of all its members to assure the integrity and consistency of their policies and procedures and to safeguard the freedom and quality of postsecondary educational institutions and programs;

(c) To promote the interests of the educational consumer, including provisions for direct public representation in the conduct of the affairs of the Council;

(d) To develop systematic procedures for recognizing institutional and specialized accrediting agencies;

(e) To develop policies and procedures for the coordination of accrediting activities, to be implemented by the appropriate member agencies or regional commissions, in the best interests of the educational institutions affected;

(f) To insure that each member accrediting agency of the Council shall provide clearly defined procedures for handling appeals through due process;

(g) To establish, promote, or direct research programs for the purpose of improving methods and techniques of accrediting as a vehicle for improving postsecondary education;

(h) To cooperate on accreditation and related matters with educational institutions and organizations, foundations and agencies of government;

(i) To study, review, and make recommendations with respect to state and federal legislation and/or rulings regarding accreditation;

(j) To represent and speak for postsecondary accreditation at the national level; provided, however, that this shall not preclude the presentation of the individual views of any organizational member of the Council or of any member of the Board from being presented before any governmental or other body;

(k) To conduct an informational program to promote understanding and effective utilization of the accrediting process, including but not limited to collection, publication, and distribution of information pertinent to accreditation;

(l) To prepare and distribute annually a list of member accrediting agencies;

(m) To provide for periodic publication and distribution of a listing of all institutions and programs accredited by member agencies; and,

(n) To undertake such other desirable and appropriate activities as the Board may determine.

FOURTH: Members. The Council membership initially shall consist of the member accrediting commissions of the Federation of Regional Accrediting Commissions of Higher Education (FRACHE) and the accrediting agencies of the Council of Specialized Accrediting Agencies (CSAA) recognized by the National Commission on Accrediting as of January 1, 1975, and the accrediting commissions of the American Association of Bible Colleges (AABC), the Association of Independent Colleges and Schools (AICS), the National Association of Trade and Technical Schools (NATTS), and the National Home Study Council (NHSC).

The Board shall establish policies and procedures for admitting new members to the Council. Membership in the Council shall be synonomous with recognition by the Board of an agency's accrediting activities, which shall be subject to periodic review, and may be obtained or terminated only by a two-thirds vote of the total membership of the Board.

FIFTH: General Powers. To further the objectives and purposes of the Council on Postsecondary Accreditation, Inc., the corporation shall have and may exercise all powers conferred by the statutes of the United States, the District of Columbia Non-Profit Corporation Act, and any other applicable statutes. Without limiting the generality of the foregoing, the corporation shall have power to sue and be sued, to purchase, take, receive, lease, take by gift, devise or bequest, or otherwise acquire, own hold, improve, use, and otherwise deal in and with, real or per-

sonal property, or any interest therein, wherever situated; to sell, convey, mortgage, pledge, lease, exchange, transfer, and otherwise dispose of all or any part of its property and assets; to lend money to and otherwise assist its employees other than its officers and directors upon approval of the Board; to make contracts and incur liabilities, borrow money at such rates of interest as the corporation may determine, issue its notes, bonds, and other obligations, and secure its obligations by mortgage or pledge of all or any of its property, franchises and income; to conduct its affairs, carry on its operations, hold property, and have offices in any part of the world and exercise the powers granted by these Articles of Incorporation and which are in furtherance of and incidental to the corporate purposes; to elect or appoint officers, employees, and agents of the corporation, and define their duties and responsibilities, and fix their compensation; to make and alter Bylaws, not inconsistent with its Articles of Incorporation or with the laws of the District of Columbia, for the administration and regulation of the affairs of the corporation. Notwithstanding the above, the Council on Postsecondary Accreditation, Inc. shall not engage in any business or other activity which is not in the furtherance of and exclusively for its educational, scientific, research, mutual improvement, and professional objectives.

SIXTH: **Board.** Management of the business of the Council shall be vested in a Board which shall have functions similar to a Board of Directors or Trustees with powers granted and defined in the District of Columbia Non-Profit Corporation Act and which shall use its best efforts to carry out in good faith the corporate purposes. Members of the Board need not be residents of the District of Columbia. The number and manner of election, selection, or appointment of the Board members shall be as provided in the Bylaws.

SEVENTH: **Tax Exemption.** No part of the net earnings of the corporation shall inure to the benefit of or be distributable to its Board, Officers, or other private persons, except that the corporation shall be authorized and empowered to pay reasonable compensation for services rendered and to make payments and distributions in furtherance of the corporate purposes. No substantial part of the activities of the corporation shall be the carrying on of propaganda or otherwise attempting to influence legislation; and the corporation shall not participate in, or intervene in (including the publishing or distribution of statements) any political campaign on behalf of any candidate for public office. Notwithstanding any other provision of these articles, the corporation shall not carry on any other activities not permitted to be carried on (a) by a corporation exempt from federal income tax under Section 501(c)(3) of the Internal Revenue Code of 1954 (or the corresponding provision of any future United States Internal Revenue Section 170 (c)(2) or the Internal Revenue Code of 1954 (or the corresponding provision of any future United States Internal Revenue Law).

EIGHT: **Dissolution.** Upon dissolution of the corporation, the Board shall, after paying or making provision for the payment of all of the liabilities of the corporation, dispose of all of the assets of the corporation among such Constituent Members of this corporation or their successors as shall be in existence and qualify as tax exempt organizations under Section 501 (c)(3) of the Internal Revenue Code of 1954 (or the corresponding provisions of any future United States Internal Revenue Law).

NINTH: **Defense Against Suit and Indemnification.** The corporation shall defend against suit or legal proceedings, pay such expenses of and idemnify against judgment or loss of any Board Member, Officer, Agent, employee, or former Board Member, Officer, Agent, or employee of the corporation, arising out of his connection with or his activities on behalf of the corporation provided he is not guilty of bad faith. This provision shall not be deemed to be exclusive of any other rights to which such person may be entitled under any Bylaw, Agreement, vote of Board or Executive Committee or Members, or otherwise.

TENTH: **Registered Agent.** The name of the Council's initial registered agent is Robert Kirkwood and the address of the initial registered offices shall be One Dupont Circle, N.W., Washington, D.C.

ELEVENTH: **Amendment, Change, or Repeal.** The affairs of the corporation shall be vested in a Board, the composition of which, except for the initial Board, shall be as provided in the Bylaws of the corporation. The Board shall have the right to exercise all of the corporate powers of the corporation, including the right to adopt Bylaws for the corporation and to provide such other rules and regulations as such Board may deem proper to govern and control the affairs of the corporation. The right to alter, amend or repeal the Articles of the Corporation or to adopt new provisions for same shall be vested in the Board and may be adopted by a two-thirds affirmative vote of the Board, a quorum being present and acting throughout, provided a written notice of the proposed amendment is given the Board Members at least thirty days in advance. The Bylaws may be amended as provided therein.

TWELFTH: **Number of Board Members and Addresses.** The number of Board Members constituting the initial Board is 16 and the names and addresses including street and number of persons who are to serve as the initial Board Members until their successors be elected and qualified are:

NCA:

President Willard L. Boyd
University of Iowa
Iowa City, Iowa 52240

Lloyd M. Cofer
202 Administration Building
East Lansing, Michigan 48823

Vice Chancellor Bruce Dearing
State University of New York
Albany, New York 12201

Chancellor Glenn S. Dumke
The California State University and Colleges
5670 Wilshire Boulevard
Los Angeles, California 90036

President Lloyd H. Elliott
The George Washington University
Washington, D.C. 20006

President John Hubbard
University of Southern California
University Park
Los Angeles, California 90007

Chancellor Leo W. Jenkins
East Carolina University
Greenville, North Carolina 27834

President Robert H. Parker
Wesley College
Dover, Delaware 19901

John C. Spores, Program Specialist
Division of Standards and Accreditation
Council on Social Work Education
345 East Forty-sixth Street
New York, New York 10017

President Duncan Wimpress
Trinity University
San Antonio, Texas 78284

ARTICLES OF AMENDMENT TO THE ARTICLES OF INCORPORATION OF COUNCIL ON POSTSECONDARY ACCREDITATION, INC.

TO: The Recorder of Deeds, D.C.
Washington, D.C.

Pursuant to the provisions of the District of Columbia Non-profit Corporation Act, the undersigned adopts the following Articles of Amendment to its Articles of Incorporation:

First: The name of the corporation is: Council on Postsecondary Accreditation, Inc.

Second: The following amendment to the Articles of Incorporation was adopted by the Corporation in the manner prescribed by the District of Columbia Non-profit Corporation Act:

Article THIRD is amended to read as follows:

THIRD: Purposes

The Council is a non-profit corporation organized under the District of Columbia Non-profit Corporation Act exclusively for educational, scientific, research, mutual improvement, and professional purposes and shall have the necessary and incidental powers to carry out its corporation purposes, among which shall be to:

1. Recognize accrediting associations that accredit institutions and programs of postsecondary education on the basis of demonstrated need and specified standards related to accrediting policies and practices.

2. Provide national leadership and understanding in speaking for postsecondary accreditation by:

   a) Cultivating a broad understanding of accreditation;

   b) Serving as a spokesman for accreditation at the national level; and,

   c) Interacting with interested parties such as educational institutions, foundations, government agencies and other organizations and groups on matters of accreditation.

3. Provide services to the accrediting associations, postsecondary educational institutions and the public by:

   a) Assisting and improving the general accrediting process, as well as the policies and practices of recognized accrediting associations;

   b) Facilitating coordination among accrediting associations;

   c) Encouraging, sponsoring and conducting research related to the understanding and improvement of accreditation;

   d) Publishing research findings and other information on accreditation. The publications include an annual list of recognized accrediting associations, together with a description of their activities, and also a list of institutions and educational programs accredited by recognized associations; and,

   e) Engaging in such other activities as may be desirable in serving the colleges and universities, the accrediting associations, and the public.

Article FOURTH is amended to read as follows:

FOURTH: Members

The Council membership shall consist of the accrediting associations recognized by the Council as of July 1, 1982 and of the American Association of Community and Junior Colleges, the American Association of State Colleges and Universities, the American Council on Education, the Association of American Colleges, the Association of American Universities, the National Association of Independent Colleges and Universities, and the National Association of State Universities and Land-Grant Colleges.

The Board shall establish policies and procedures governing membership in the Council. Except as provided in the Bylaws, membership in the Council shall be synonymous with recognition by the Board of the member's accrediting activities, which shall be subject to periodic review, and which may be obtained or terminated only by a fifty-one percent (51%) vote of the total membership of the Board.

Third: The amendment was adopted at a meeting of the Board of Directors held on April 14, 1982 and received the vote of a majority of the Directors in office, there being no members having voting rights in respect thereof.

April 26, 1982

Council on Postsecondary Accreditation, Inc.

By _____
Richard M. Millard, President

Attest:

_____
Thomas B. Ragle, Secretary-Treasurer

ARTICLES OF AMENDMENT TO THE ARTICLES OF INCORPORATION OF COUNCIL ON POSTSECONDARY ACCREDITATION, INC.

TO: The Recorder of Deeds, D.C.
Washington, D.C.

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Article THIRD is amended to read as follows:

THIRD: Purposes

The Council is a non-profit corporation organized under the District of Columbia Non-profit Corporation Act exclusively for educational, scientific, research, mutual improvement, and professional purposes and shall have the necessary and incidental powers to carry out its corporation purposes, among which shall be to:

1. Promote, improve, and assure the quality and diversity of postsecondary education in the United States.

2. Review and recognize accrediting bodies on the basis of standards related to the effectiveness of the policies and practices of each accrediting body in assessing and encouraging improvement of and in the quality of postsecondary educational institutions and/or programs.

3. Provide national leadership for postsecondary accreditation and the enhancement of educational quality by:

   a) Cultivating an understanding of the role, nature, and significance of accreditation;

   b) Serving as an official voice for accreditation at national and state levels;

   c) Initiating conferences and activities for the purposes of improving the understanding of accreditation and the processes of assessment; and

   d) Promoting active collaboration and/or interaction among educational leaders, institutions/programs, and federal and state agencies.

4. Provide services by:

   a) Assisting institutions, programs, and accrediting bodies to improve the implementation of accrediting policies and procedures;

   b) Offering professional development programming to the membership and interested parties;

   c) Providing a forum and vehicle for discussion and development of national accreditation policies;

   d) Facilitating coordination among accrediting bodie

   e) Encouraging, sponsoring, conducting and publishing research related to the understanding and improvement of accreditation;

   f) Monitoring federal and state activities related to accreditation and informing the accrediting community; and

   g) Publishing annual lists of recognized accrediting bodies, the institutions and programs which they accredit, and other information on accreditation.

Article FOURTH is amended to read as follows:

FOURTH: Members

The Council membership shall consist of the accrediting associations recognized by the Council as of July 1, 1987 and organizations representing the national postsecondary education community. New members shall be admitted to the Council upon having met the policies and procedures established by the Board for admitting new members.

The Board shall establish policies and procedures governing membership in the Council. Except as provided in the Bylaws, membership in the Council shall be synonymous with the recognition by the Board of the member's accrediting activities, which shall be subject to periodic review, and which may be obtained or terminated only by a fifty-one percent (51%) vote of the total membership of the Board.

Third: The amendment was adopted at a meeting of the Board of Directors held on April 17, 1987 and received the vote of a majority of the Directors in office, there being no members having voting rights in respect thereof.

Council on Postsecondary Accreditation, Inc.

By _____
Richard M. Millard, President

Attest:

_____ _____
Ellis E. McCune, Chair (date)

BYLAWS

Council on Postsecondary Accreditation
April 17, 1987

Preamble

Accreditation is a unique time-tested feature of American postsecondary education. Its purposes are to maintain and improve the quality of educational performance and safeguard the public from educational programs of unacceptable quality and from inadequate educational practices. These goals are achieved through voluntary associations of educators and other professional persons. These associations provide careful scrutiny of educational practices and impose sanctions; yet they operate in ways consistent with traditional autonomy and freedom of individual schools, colleges and universities.

The Council on Postsecondary Accreditation (the Council) plays a leadership role in the accreditation process. Its task is to monitor the accrediting process and insure that, as it is carried on by the various accrediting bodies, it is conducted effectively and responsibly in the interests of the students who are being educated and of the general public.

The Council's governance reflects and is consistent with the traditional autonomy and academic freedom of institutions of higher education and other postsecondary educational institutions. This autonomy requires that the educational institutions collectively exercise substantial control over the accrediting process, as is consistent with its self-regulatory character. The Council's governance also insures the involvement and acceptance of responsibility for accreditation and its coordination by postsecondary institutions and programs as represented by responsible academic officials.

Full and equitable participation and involvement of educational institutions, institutional and specialized associations, national postsecondary educational organizations and representatives of the public provide unity and integrity to the Council's structure. This results in an effective forum for institutional and specialized accrediting associations and national postsecondary educational organizations to deal with their mutual and separate concerns in accreditation and to formulate, debate, forward and implement policy positions.

Finally, the Council establishes standards and procedures by which accrediting agencies are recognized, or by which such recognition is withdrawn, and provides an appropriate means for dealing with issues of overriding public interest and concern in accreditation.

ARTICLE I
Name, Seal, and Offices

Sec. 1:01. Name.

The name of this organization is the Council on Postsecondary Accreditation, Inc. (hereinafter referred to as the "Council").

Sec. 1:02. Seal.

The seal of the corporation shall be circular in form and shall bear on the upper portion of the outer circle the title of the Council and on the lower portion of the outer circle the words "Washington, D.C." In the center of the seal shall appear the words "Corporate Seal." The Board of the Council (hereinafter referred to as the "Board") may change the form of the seal or the inscription thereon at its discretion.

Sec. 1:03. Offices.

The principal office of the Council shall be located in Washington, D.C. In accordance with the laws of the District of Columbia for non-profit corporations, the Council may have other offices within or without the District of Columbia as the Board may from time to time determine.

ARTICLE II
Purposes

The Council is a non-profit corporation organized under the District of Columbia Non-Profit Corporation Act exclusively for educational, scientific, research, mutual improvement, and professional purposes and shall have the necessary and incidental powers to carry out its corporation purposes, among which shall be to:

1. Promote, improve, and assure the quality and diversity of postsecondary education in the United States.

2. Review and recognize accrediting bodies on the basis of standards related to the effectiveness of the policies and practices of each accrediting body in assessing and encouraging improvement of and in the quality of postsecondary educational institutions and/or programs.

3. Provide national leadership for postsecondary accreditation and the enhancement of educational quality by:

   a) Cultivating an understanding of the role, nature, and significance of accreditation;

   b) Serving as an official voice for accreditation at national and state levels;

   c) Initiating conferences and activities for the purposes of improving the understanding of accreditation and the processes of assessment; and

   d) Promoting active collaboration and/or interaction among educational leaders, institutions/programs, and federal and state agencies.

4. Provide services by:

   a) Assisting institutions, programs, and accrediting bodies to improve the implementation of accrediting policies and procedures;

   b) Offering professional development programming to the membership and interested parties;

   c) Providing a forum and vehicle for discussion and development of national accreditation policies;

   d) Facilitating coordination among accrediting associations;

   e) Encouraging, sponsoring, conducting and publishing research related to the understanding and improvement of accreditation;

   f) Monitoring federal and state activities related to accreditation and informing the accrediting community; and

   g) Publishing annual lists of recognized accrediting bodies, the institutions and programs which they accredit, and other information on accreditation.

ARTICLE III
Accreditation

Except for members assigned by the Board to the Presidents Policy Assembly on Accreditation, each member of the Council shall have the responsibility as recognized by the Board for the evaluation and accreditation of postsecondary institutions or programs. This determination shall be in the form of a statement of scope for each member's accrediting activities. The accreditation of a postsecondary institution or program by one member of the Council shall be recognized by all other members provided, however, that such recognition shall not in any manner infringe upon the independence of each institution to choose or admit students in accordance with its own policies. The Council shall serve in a recognizing, reviewing, and coordinating capacity but shall not be an accrediting association for individual institutions or educational programs.

ARTICLE IV
Membership and Officers

Sec. 4:01. Membership.

The Council membership shall consist of the accrediting associations recognized by the Council as of July 1, 1987 and organizations representing the national postsecondary education community. New members shall be admitted to the Council upon having met the policies and procedures established by the Board for admitting new members.

The Board shall establish policies and procedures governing membership in the Council. Except for members assigned by the Board to the Presidents Policy Assembly on Accreditation, membership in the Council shall be synonymous with recognition by the Board of the member's accrediting activities, which shall be subject to periodic review, and which may be obtained or terminated only by a fifty-one percent (51%) vote of the total membership of the Board.

Sec. 4:02. Officers.

Officers of the Council shall be the Officers of the Board as hereinafter provided.

ARTICLE V
The Board

Sec. 5:01. General Powers.

The activities of the Council shall be managed by its Board. All the corporate powers, except as otherwise provided for in the Articles of Incorporation and these bylaws, shall be and are hereby vested in and shall be exercised by the Board as provided in the Articles of Incorporation of the Council.

Sec. 5:02. Policy.

The Board shall establish, in consultation with the Assemblies, formal procedures for developing, adopting, and implementing policy.

Sec. 5:03. Number and Qualifications.

The Board shall consist of nineteen members who, with the exception of ex-officio and public members, shall hold positions of responsibility in accredited institutions or programs of postsecondary education. In electing persons to the Board, the three Assemblies, as hereinafter provided, should elect persons who may normally be expected to complete their full three-year terms.

The composition of the Board membership shall be as follows:

1. Three elected by the Assembly of Institutional Accrediting Bodies, ... 3
2. Three elected by the Presidents Policy Assembly on Accreditation, ... 3
3. Three elected by the Assembly of Specialized Accrediting Bodies, ... 3
4. Three chief executive officers of accredited institutions elected by the Board, ... 3
5. Three public representatives elected by the Board from outside the academic accrediting community, and 3
6. Four ex-officio members: 4
   a) The Chairperson of the Assembly of Institutional

Accrediting Bodies,

b) The Chairperson of the Presidents Policy Assembly on Accreditation,

c) The Chairperson of the Assembly of Specialized Accrediting Bodies,

d) The President of the Council.

Total Composition of the Board: 19

At any time, the Board membership shall consist of those members then holding appointments as provided above.

Staff persons of the accrediting bodies which are members of the Council may attend meetings, serve as consultants or observers, and participate in discussions when recognized by the Chairperson. Executives and/or representatives from other accrediting or educational constituencies, e.g., members of the Council of Regional School Accrediting Commissions or the State Higher Education Executive Officers organization, also may be invited to Board meetings as observers in accordance with the public meeting policy adopted by the Board.

Sec. 5:04. Terms of Office.

The terms of office of Board members shall be as follows:

1. The terms of office of elected Board members shall normally be three years. To assure that approximately one-third of the Board shall be elected each year, however, the Board shall make provisions for deciding which members with terms beginning July 1, 1982 shall serve for terms of less than three years. *Ex-officio* Board members shall serve concurrently with the terms of their respective offices.

2. No elected Board member shall serve more than two full three-year terms except that the Chairperson-Elect, as hereinafter provided, shall be eligible to serve for such additional years as shall be necessary to complete his scheduled term or terms as an officer.

3. Except for the President, each person selected for membership on the Board shall be given written notice of appointment by the President of the Council. The President shall be given notice by contract when appointed.

4. A Board member shall become ineligible to serve if the member changes professional positions and assumes professional duties outside the community of interests which established the eligibility for his/her original membership on the Board.

5. Unexpired terms of Board members shall be filled in the same manner in which the original selection was made. Such new members shall assume office immediately and shall serve for the remainder of the respective terms. Such elected members shall subsequently be eligible to serve two full three-year terms. Such *ex-officio* members shall serve concurrently with the terms of their respective offices.

6. All new members of the Board serving regular terms shall assume office on July 1 following their election.

7. A Board member who completes two full three-year terms shall be eligible for reelection after the expiration of three years.

Sec. 5:05. Officers of the Board, Terms, and Duties.

Officers of the Board shall be a Chairperson, a Chairperson-Elect in election years, a Past Chairperson in alternate years, a Treasurer, a Secretary, and the Chairperson of the Committee on Recognition. An election year shall be the fiscal year following an election of officers. The Chairperson-Elect, the Treasurer, and the Chairperson of the Committee on Recognition shall be elected at an annual meeting from among members of the Board and by members of the Board. The Chairperson-Elect and Past Chairperson shall serve for alternate terms of one year. The Chairperson, the Treasurer, and the Chairperson of the Committee on Recognition shall serve for terms of two years. The Treasurer and the Chairperson of the Committee on Recognition shall be eligible for reelection for one additional term. The Chairperson Elect, the Treasurer, and the Chairperson of the Committee on Recognition and shall take office on July 1 following their election. The Secretary shall be the President of the Council. As previously noted, the officers of the Board shall be deemed to be officers of the Council and as hereinafter provided shall be members and officers of the Executive Committee. A vacancy in an office may be filled by the Board for the unexpired portion of the term.

The duties of the Officers shall be as follows:

1. The Chairperson shall preside at all meetings of the Board and of the Executive Committee and shall perform all duties which are usually attendant upon this office, and other duties as may be prescribed by the Board.

2. Upon completion of his/her term, the Chairperson shall become Past Chairperson.

3. The Chairperson-Elect, in the absence of the Chairperson, shall perform the duties of the Chairperson and when so acting shall exercise the powers of the Chairperson as prescribed in these bylaws. The Chairperson-Elect shall also perform other duties as may be assigned by the Chairperson.

4. Upon completion of his/her term, the Chairperson-Elect shall become Chairperson.

5. The Past Chairperson, in the absence of the Chairperson, shall perform the duties of the Chairperson and when so acting shall exercise the powers of the Chair-

person as prescribed in these bylaws. The past Chairperson shall also perform such other duties as may be assigned by the Chairperson.

6. The Treasurer shall perform all duties which are usually attendant upon this office or as may be delegated or assigned by the Chairperson.

7. The Secretary shall perform all duties which are usually attendant upon this office or as may be delegated or assigned by the Chairperson. In the absence or disability of the Secretary, the Chairperson, Chairperson-Elect, Past Chairperson, or Treasurer may sign all papers normally requiring the signature of the Secretary.

8. The Chairperson of the Committee on Recognition shall represent the interests of the Committee on Recognition and shall perform all duties as may be delegated or assigned by the Chairperson.

Sec. 5:06. Meetings.

There shall be regular meetings and special meetings of the Board, as follows:

1. Regular Meetings. The Board shall have a fall meeting and a spring meeting each year and such other meetings as may be necessary at the time and place designated by the Board. The spring meeting of the Board shall be in conjunction with the meeting of the Combined Assembly and shall be designated the annual meeting of the Council. Written notice shall be given at least ten (10) days prior to each meeting.

2. Special Meetings. Special meetings of the Board may be called by the Chairperson (or President acting as his/her agent) or at the request of any five (5) elected members of the Board. The President shall fix the time and place for special meetings. Written notice shall be given at least ten (10) days prior to each special meeting.

Sec. 5:07. Quorum and Manner of Acting.

Fifty-one percent (51%) of the elected Board membership shall constitute a quorum for purposes of carrying on the work of the Board. Except as may be otherwise provided in these bylaws, actions shall be taken on affirmative vote of a majority of the voting members of the Board present at any regular or special meeting. Proposals for action may be placed before the Board by any member of the Board. Routine matters will be acted upon at the same meeting where they are presented. Major substantive proposals ordinarily will not be acted upon at the meeting at which they are first introduced unless they have been circulated to all Board members at least fifteen (15) days prior to the meeting, or unless action to consider such proposals is approved by two-thirds of the elected members present and voting. Except for the President of the Council, *ex-officio* members shall vote on all matters before the Board.

Sec. 5:08. Minutes.

The draft minutes of the meetings of the Board shall be sent to each member thereof, to each member of the Council, and to such other agencies or individuals as the Board may designate. The draft minutes of meetings of the Board, or of any committee thereof, shall not become the official records of the Council until approved by the Board or committee present at the meeting for which the minutes are prepared.

Sec. 5:09. Compensation.

Except for the President, Board members shall receive no compensation for their services, but shall be reimbursed for travel and other necessary expenses incurred in fulfilling their duties as Board members. The Board shall fix by contract the compensation and other emoluments of the President.

ARTICLE VI
Executive Committee

Sec. 6:01. Membership, Election, and Terms of Office.

There shall be an Executive Committee of the Board composed of six members to include the Chairperson of the Board, Chairperson-Elect in election years, Past Chairperson in alternate years, Treasurer, Chairperson of the Committee on Recognition, and an elected Member At-Large, each as voting members, and the Secretary as a non-voting member. The Chairperson, Chairperson-Elect, Past Chairperson, and Treasurer shall serve concurrently with the terms of their respective offices. The Chairperson of the Committee on Recognition and the Member At-Large shall be elected in the same year for two year terms from among the members of the Board. The Secretary shall be the President of the Council.

Sec. 6:02. General Powers and Duties.

The Executive Committee shall have and may exercise all the powers of the Board during the interim period between meetings of the Board, except that the Executive Committee shall not have the power to amend these bylaws or to determine membership or discontinuance of membership in the Council. The Committee may specifically reserve certain powers to itself or specifically assign them to other committees or officers.

The Executive Committee shall prepare and approve the agenda for each meeting of the Board and shall make recommendations to the Board on the annual budget, financing plan, dues, assessments and outside funding. The Committee shall also oversee the Council's investments, review the audit, and monitor and review staff organization and compensation.

Sec. 6:03. Meetings.

The Executive Committee shall meet at least semi-annually and at such other times as may become necessary. Meetings of the Executive Committee may be called by the Chairperson, or in

Chairperson's absence or disability, by the Chairperson-Elect or Past Chairperson. Written notice shall be given at least five (5) days prior to each meeting to each member of the Executive Committee at addresses shown on the records of the Council, except that written notice may be waived provided an emergency exists and each Executive Committee member is otherwise notified. A majority of the voting membership of the Executive Committee shall constitute a quorum.

Sec. 6:04. Reporting.

The Executive Committee shall report to the Board at each of the Board's regular or special meetings presenting a summary of the Committee's activities since the last previous meeting of the Board.

Sec. 6:05. Compensation.

Except for the President, members of the Executive Committee shall receive no compensation for their services but shall be reimbursed for travel and other necessary expenses incurred in fulfilling their duties as committee members. The Board shall fix by contract the compensation and other emoluments of the President.

ARTICLE VII
Committee on Recognition

Sec. 7:01. Membership, Appointment, and Terms of Office.

There shall be a Committee on Recognition composed of nine members. The Chairperson shall be a member of the Board and shall be elected by the Board. The remaining members shall be appointed by the Board from outside the membership of the Board. Each of the following groups shall be represented by two members of the Committee:

1. The Assembly of Institutional Accrediting Bodies,
2. The Presidents Policy Assembly on Accreditation,
3. The Assembly of Specialized Accrediting Bodies, and
4. The Public.

The Chairperson and other members of the Committee shall serve for two years and shall be eligible for appointment to one additional term. They shall take office on July 1 following their appointment.

Sec. 7:02. Duties.

Under policies and criteria established by the Board, the Committee on Recognition shall review applications of organizations proposing to engage in accreditation of postsecondary institutions or educational programs, examine relevant information, conduct hearings, and consult and inform persons about such applications. The Committee shall also evaluate the current performance of recognized accrediting bodies and may offer recommendations concerning the continuance of the recognition. The Committee shall advise the Board on matters of criteria and procedure in connection with the recognition process. After conducting its review of an organization, the Committee shall report its findings and recommendations to the Board.

The Committee shall also recommend changes in the Council's recognition provisions and procedures, recommend fees for the recognition process, approve review schedules, appoint ad hoc review panels and reader/consultants and make recommendations concerning interagency cooperation in accreditation.

Sec. 7:03. Meetings.

The Committee on Recognition shall meet as may become necessary. Meetings of the Committee shall be called by the Chairperson. A majority of the membership of the Committee shall constitute a quorum.

Sec. 7:04. Reporting.

The Committee on Recognition shall report to the Board at each of the Board's annual meetings, and at other regular or special Board meetings as may become necessary.

Sec. 7:05. Compensation.

Members of the Committee on Recognition shall receive no compensation for their services but shall be reimbursed for travel and other necessary expenses incurred in fulfilling their duties as committee members.

ARTICLE VIII
Committee on State Relations

Sec. 8:01. Membership, Appointments, and Terms of Office.

There shall be a Committee on State Relations composed of at least five members appointed by the Chairperson of the Board. Members of the Committee shall serve staggered two-year terms and shall be eligible for reappointment to one additional term. They shall take office on July 1 following their appointment.

Sec. 8:02. Duties.

The Committee on State Relations shall serve in an advisory capacity to the Board, and in this role it may recommend items for the agenda of the Board or the Executive Committee. The Committee shall be responsible for helping to formulate policies of the Council on Postsecondary Accreditation as it relates to states and to state agencies. It shall serve when and if appropriate as the Council on Postsecondary Accreditation constituency of a joint Council on Postsecondary Accreditation/State Higher Education Executive Officers Liaison Committee to address common in-

terests of both the Council on Postsecondary Accreditation and the State Higher Education Executive Officers including, but not limited to, issues related to quality improvement and enhancement of postsecondary education.

Sec. 8:03. Meetings.

The Committee on State Relations shall meet at least annually either with the State Higher Education Executive Officers constituency of the Liaison Committee and/or separately as may become necessary.

Sec. 8:04. Reporting.

The Committee on State Relations shall report to the Board at each of the Board's annual meetings and at other regular or special Board meetings as may become necessary.

Sec. 8:05. Compensation.

Except for the President, Committee members shall receive no compensation for their services, but shall be reimbursed for travel and other necessary expenses incurred in fulfilling their duties as Committee members.

ARTICLE IX
Committee on Professional Development

Sec. 9:01. Membership, Appointment, and Terms of Office.

There shall be a six member Professional Development Committee composed of the Vice Chairpersons of the Assembly of Institutional Accrediting Bodies and the Assembly of Specialized Accrediting Bodies or their designees, two representatives of the Assembly of Specialized Accrediting Bodies, one of the Assembly of Institutional Accrediting Bodies, and one of the Presidents Policy Assembly on Accreditation appointed by the Chairperson of the Board. The Chairperson shall rotate annually between the Vice Chairpersons or their designees of the Assembly of Institutional Accrediting Bodies and the Assembly of Specialized Accrediting Bodies. Members of the Committee shall serve for two years and shall be eligible for reappointment for one additional term. Members shall take office on July 1 following their appointment.

Sec. 9:02. Duties.

The Professional Development Committee shall be responsible for the general planning of those activities which will enhance the development of staff of accrediting bodies. The Committee shall advise the Board on matters of professional development and shall be responsible for specific duties assigned by the Board. The Committee shall determine the schedule of Professional Development programs.

Sec. 9:03. Meetings.

The Professional Development Committee shall meet at least semiannually and at such other times as may become necessary.

Sec. 9:04. Reporting.

The Professional Development Committee shall report to the Board at each annual meeting and at other regular or special Board meetings as may become necessary.

Sec. 9:05. Compensation.

Members of the Professional Development Committee shall receive no compensation for their services but shall be reimbursed for travel and other necessary expenses incurred in fulfilling their duties as Committee members.

ARTICLE X
Nominating Committee

Sec. 10.01. Membership, Appointment, and Terms of Office.

There shall be a Nominating Committee composed of at least three members, appointed by the Chairperson of the Board. The Chairperson of the Committee shall be a member of the Board; other members may be selected from outside Board membership. The Chairperson and other members of the Nominating Committee shall serve for one year and shall be eligible for reappointment for one additional term. Members shall take office on July 1 following their appointment.

Sec. 10.02. Duties.

The Nominating Committee shall receive and review nominations and place before the Board for election persons qualified for the following positions:

Board members from among chief executive officers of accredited institutions;

Board members to represent the public;

Chairperson-elect of the Board;

Treasurer of the Board;

Member At-large of the Executive Committee;

Members of the Committee on Recognition; and

Chairperson of the Committee on Recognition.

Sec. 10.03. Meetings.

The Nominating Committee shall meet at least annually and at other times as may be necessary.

Sec. 10.04. Reporting.

The Nominating Committee shall report to the Board annually at the annual meeting or at any other meeting during which elections are to be held.

Sec. 10.05. Compensation.

Members of the Nominating Committee shall receive no compensation for their services but shall be reimbursed for travel and other necessary expenses incurred in fulfilling their duties as Committee members.

ARTICLE XI
Special Assemblies

Sec 11:01. Membership.

There shall be three special assemblies as an integral part of the Council as follows:

1. Assembly of Institutional Accrediting Bodies,
2. Presidents Policy Assembly on Accreditation,
3. Assembly of Specialized Accrediting Bodies.

Each postsecondary accrediting body recognized by the Council shall be assigned by the Board to either the Assembly of Institutional Accrediting Bodies or the Assembly of Specialized Accrediting Bodies, but not both. If an accrediting body believes it has been improperly classified, or if an assembly believes that an accrediting body's membership is inappropriate, the Board shall reconsider the classification on appeal and make a final determination.

The Presidents Policy Assembly on Accreditation shall develop procedures and conditions for membership, subject to approval by the Board. Members of this Assembly shall be major national postsecondary institutional organizations that do not conduct accreditation and shall include the participation of governing boards through the membership of the Association of Governing Boards of Universities and Colleges. Each organization shall designate two members to serve on the Assembly. Members may be added or removed in accordance with this Assembly's rules or the provisions of these bylaws or by the Board.

Failure to pay annual membership dues as assessed by the Council shall constitute cause for removal from membership in the Council.

Sec. 11:02. General Powers.

Each Assembly shall have the power to:

1. Elect members to the Board as herein provided,
2. Place matters on the agenda of the Board,
3. Report to the Board,
4. Prepare its own agenda,
5. Elect its own officers as herein provided,
6. Delegate to its officers the power to act on its behalf between Assembly meetings,
7. Meet as an assembly or as subgroups of the Assemblies as may become necessary, in addition to the regular annual meeting of the Assemblies, as herein provided,
8. Nominate at least two representatives to the Committee on Recognition,
9. Receive reports from its chairperson on its activities or those of any subgroup,
10. Request necessary staff assistance from the Council,
11. Adopt rules of order to govern its meetings; however, such rules shall not be inconsistent with any provision of the Bylaws or Articles of Incorporation of the Council or with the laws of the District of Columbia.

Notwithstanding the above, no Assembly shall act on behalf of the Council or engage in any business or other activity obligating the Council or otherwise abridging any rights, powers or privileges of the Council.

Sec. 11:03. Officers of Assemblies, Terms and Duties.

Officers of each Special Assembly shall be a Chairperson, a Vice Chairperson, and a Secretary, each of whom shall be elected at the annual meeting of the Assembly. Officers shall be representatives of the respective assembly members and shall take office on July 1 following their election. Officers shall serve for three years. Officers may be removed and vacancies filled as each Assembly shall determine.

The duties of the officers shall be as follows:

1. The Chairperson shall preside at all meetings of the respective Assembly and shall perform all duties which are usually attendant upon this office.
2. The Vice Chairperson, in the absence of the Chairperson, shall perform the duties of the Chairperson and when so acting shall exercise the powers of the Chairperson. The Vice Chairperson shall perform other duties as may be assigned by the Chairperson.
3. The Secretary shall perform all duties which are usually attendant upon this office or as may be delegated or assigned by the Chairperson.
4. No automatic order of succession of office is intended by these titles or descriptions of duties.

5. The Chairperson of each Assembly shall serve as an *ex-officio* member of the Board of the Council.

6. The Board shall make provisions for deciding which officers of the Assemblies shall be assigned terms of less than three years to insure that one-third of the officers shall be elected each year.

Sec. 11:04. Meetings.

There shall be regular meetings, special meetings, subgroup meetings, and officers' meetings of the assemblies as follows:

1. Regular Meetings. There shall be a spring meeting of each Assembly at which they shall meet separately as Assemblies and concurrently as the Combined Assembly. The spring meeting shall be the annual meeting and shall be held in conjunction with the annual meeting of the Board. The Chairperson of the Combined Assembly shall be the Chairperson of the Assembly who is serving the last year of his/her term. The Presidents Policy Assembly on Accreditation may schedule one additional meeting on call. The Assembly of Institutional Accrediting Bodies and the Assembly of Specialized Accrediting Bodies may meet in conjunction with the fall Board meeting on call.

2. Special Meetings. Special meetings of each Assembly may be called by the respective Chairperson or at the written request of a majority of the members of the respective Assembly. The Chairperson shall fix the time and place for special meetings. Written notice shall be given to members at least ten (10) days prior to each special meeting.

3. Subgroup Meetings. Members of each Assembly may meet as a subgroup at the time of the regular Assembly meetings, at the fall meeting of the Board, or at such other times and places as they may decide in cooperation with COPA staff. Each such meeting of a subgroup shall designate a chairperson pro-tem who shall not be an Assembly officer.

   Subsequent to each such meeting the chairperson pro-tem shall report to the Chairperson and to the Secretary of the respective Assembly on the activities of the subgroup meeting.

4. Officers' Meetings. The Officers of the Assemblies shall meet with the Officers of the Board prior to and in conjunction with the fall and spring meetings of the Board.

5. A majority of the membership of each Assembly shall constitute a quorum for general and special meetings of the respective Assembly or meetings of the Combined Assembly.

Sec. 11:05. Reporting.

Each Assembly shall report to the Board at each of the Board's annual meetings and at other regular or special Board meetings as may become necessary.

Each Chairperson shall report to the respective Assembly at each of the Assembly's annual meetings and at other regular or special Assembly meetings as may become necessary.

Sec. 11:06. Compensation.

Officers of each Assembly shall receive no compensation for their services but shall be reimbursed for travel and other necessary expenses incurred in fulfilling their duties as assembly officers.

ARTICLE XII
Administration

Sec. 12:01. The President.

The Board shall appoint a President to serve at its pleasure as the chief executive staff officer of the Council, and shall fix by contract the duties, responsibilities, and emoluments of the position.

The President shall provide leadership in carrying on the work of the Council, shall represent and express the views of the Council when and where appropriate, and shall serve as the custodian of the corporate records. The President shall see that all notices are duly given in accordance with these Bylaws or as required by law; arrange for meetings, printing, mailing, and the like; serve as Secretary of the Board, as an *ex-officio* member of the Board, and as an *ex-officio* member of all committees of the Council; keep the official minutes of all meetings of the Board, the Executive Committee, and all special committees; and coordinate Council studies and research projects. The President shall receive and collect dues and other obligations to the Council, pay its debts, manage its assets, and otherwise perform the functions of business manager.

In addition, the President shall perform other duties as may be assigned by the Board or the Executive Committee in accordance with the corporate purposes of the Council.

Sec. 12:02. Staff.

The President shall appoint professional and support personnel as needed in consultation with and on terms approved by the Executive Committee.

Sec. 12:03. Annual Report.

The President shall make each year at the annual meeting a written report on the affairs of the Council. Such report shall be made to the Board, which may authorize its further distribution.

ARTICLE XIII
Finances

Sec. 13:01. Dues.

The Board shall be responsible for the finances of the Council

shall adopt a financing plan fixing the dues or assessments to be levied for its support, and shall be empowered to seek and accept funds from various sources if and when deemed desirable for carrying on the purposes of the Council.

Sec. 13:02. Budget.

The Board shall approve an annual budget for the operation of the Council. It shall also approve emergency appropriations and/or assessments. The Budget of the Council shall be adequate to support its basic services; however, part of the budget may be met by subscriber fees for information services and by gifts and grants for research and special projects.

Sec. 13:03. Audit.

The finances of the Council shall be audited each year by a certified public accountant or firm and such auditor or firm shall submit a written report immediately following the end of each fiscal year. Copies of the written report shall be provided to the officers and shall be available to each member of the Board. Summaries of the audit report shall be circulated to each member of the Board and to each member of the Council. The fiscal year for the Council shall begin on July 1 of each year and shall end on June 30 of the succeeding year.

ARTICLE XIV
Other Committees

The Board, in addition to the Executive Committee, the Committee on Recognition, the Committee on State Relations, the Committee on Professional Development, and the Nominating Committee, may establish such other committees and assign their duties as it deems necessary to carry out the functions of the Board or the Council. Members of committees need not be members of the Board. Members of committees shall receive no compensation for their services but shall be reimbursed for travel and other necessary expenses incurred in fulfilling their duties as committee members. Committees shall include panels, task forces, ad hoc groups, etc. as the Board may designate.

ARTICLE XV
Power of Attorney

The Chairperson, Chairperson-Elect or Past Chairperson, Treasurer, and Secretary shall have authority as attorney in fact to execute and acknowledge on behalf of the corporation, legal documents or other instruments in connection with the operations of the corporation as approved generally and specifically by the Executive Committee or the Board.

ARTICLE XVI
Bonding

The Treasurer, Secretary, and other officers and employees as required by the Board shall be bonded at the expense of the Council in the amounts determined by the Board.

ARTICLE XVII
Removal

Sec. 17:01. Executive Officers.

Executive officers or agents appointed or elected by the Board may be removed by a two-thirds vote of the total elected membership of the Board at any regular meeting or special meeting called for that purpose.

Sec. 17:02. The Board Members.

A Board member absent without cause from two consecutive meetings of the Board may be removed by the Board. A new member shall then be requested from the assembly originally making the appointment or a new member shall then be elected by the Board.

ARTICLE XVIII
Administration of Property

Sec. 18:01. General Powers.

The Board, representing the corporation, shall have the power to sue and be sued, to purchase, take, receive, lease, take by gift, devise or bequest, or otherwise acquire, own, hold, improve, use and otherwise deal in and with real or personal property, or any interest therein, and otherwise dispose of all or any part of its property and assets; to lend money to and otherwise assist its employees other than its officers and directors; to make contracts and incur liabilities, borrow money at such rates of interest as the corporation may determine, issue its notes, bonds, and other obligations, and secure its obligations by mortgage or pledge of all or any of its property, franchises and income; to conduct its affairs, carry on its operations, hold property, and have offices and exercise the powers granted by this charter in any part of the world; to elect or appoint officers and agents of the corporation, and define their duties and fix their compensation; to make and alter bylaws, not inconsistent with its Articles of Incorporation or with the laws of the District of Columbia, for the administration and regulation of the affairs of the Corporation. Notwithstanding the above, the Council shall not engage in any business or other activity which is not in the furtherance of and exclusively for its educational, scientific, research, mutual improvement, and professional purposes, and which do not compiy fully with the Sherman Act, the Clayton Act and the Federal Trade Commission Act.

Sec. 18:02. Funds.

The funds of the corporation shall be deposited in such depositories as may be approved by the Board or the Executive Committee, but such depositing authority may be delegated by them to the President.

Sec. 18:03. Litigation.

The corporation shall defend against suit or legal proceedings, pay the expenses and indemnify against judgment or loss of any

Board member, officer, agent or employee or former Board member, officer, agent or employee of the corporation arising out of any connection with or activities on behalf of the corporation provided that person is not guilty of bad faith. This provision shall not be deemed to be exclusive of any other rights to which such person may be entitled under any bylaw, agreement, vote of the Board, Executive Committee, or members, otherwise.

ARTICLE XIX
Amendments

Amendments to these bylaws may be proposed by any member of the Board or by any member of the Council. Amendments shall be submitted to the Board at least thirty (30) days prior to consideration thereof by the Board. Amendments shall be adopted by a two-thirds vote of the total membership of the Board, and shall become effective on the date as it shall determine.

ARTICLE XX
Procedure

Robert's Rules of Order, Revised, shall govern all meetings of the Board, the Executive Committee and parliamentary procedures of the Council insofar as they are not inconsistent with applicable statutes, the Articles of Incorporation and these bylaws, unless other specific procedure is provided by the Board.

ARTICLE XXI
Dissolution

The Council may be dissolved, or merged with another similar corporation carrying on substantially the same activities, upon approval of a plan of dissolution adopted by a two-thirds vote of the total membership of the Board. Such a plan of dissolution shall provide for the complete payment and discharge of all corporate obligations before disposition of the net corporate assets, which may then be distributed equally among such constituent members of this corporation or their successors as are in existence, actively engaged, and qualify as tax-exempt organizations under Section 501(c)(3) of the Internal Revenue Code of 1954 (or the corresponding provision of any future United States Internal Revenue Law).